

PUBLIC COMMENT ON 2019 ELK SHOULDER SEASONS

The public comment period ran from December 10, 2018 to January 15, 2019 and we received 287 comments.

Survey Monkey Comments (253).....1

Email/Letter Comments (34).....33

- 1 Lynn Carey Seeley Lake MT I have no problem with continuing the shoulder season, but until something happens to get better access on private land it won't solve the problem.
- 2 Lindy Rueb GREAT FALLS MT I feel the seasons are too long and will cause long term damage. Montana can handle 140,000 elk, Colorado manages 220,000 with a lot less land and a lot more people. The FWP should consider shortening the shoulder season or eliminating it all together. Shortening the season would help calf retention. Six months is way to long to be pressuring elk herds. Large land owners need to allow more cow hunting during the regular season or deal with the repercussions. It is a dangerous management strategy to eliminate 30-50 thousand cow elk. Look at the Yellowstone elk herd, it will never recover. Please consider the future of all Montanans and their love for the outdoors.
- 3 Frank Wilkinson Billings MT As a new resident I hope to partake in next years should hunt! I am not a horn hunter but prefer wild game to store. Please give me the chance to fill my freezer with fresh nutritious wild game. Thanks
- 4 Tom Hamilton Belgrade MT I like the shoulder season hunts and hope they continue as there are a lot of elk in southwest Montana that are really hard to access at times. Weather does play a big part in the hunting season and the shoulder hunts gives a second chance. I think at least private landowners who normally don't let people hunt should open it up under a specific block management arrangement during the shoulder hunt. Is that an addition might help us manage the herds even better.
- 5 Brady Cannon Lewistown MT Since the implementation of the shoulder seasons, archery hunting on state and BLM lands has gone downhill in Central Montana. Allowing rifle hunters to hunt public lands in August is pushing elk to their sanctuaries earlier in the season and is disrupting archery elk hunting during the rut. I have seen this happen first hand in HD 412. It is unfair to archery hunters to let rifle hunters on public lands in August. Archery hunters pay an additional fee to hunt with a bow n arrow; therefore, they pay more for their respective tag than a hunter who purchases an Elk B license for shoulder seasons. Not to mention the cost of the application fee for a permit to archery hunt as opposed to an over the counter Elk B license. Do we know how much meat spoils from elk shot on public lands in August? Its too hot to kill elk when it is still 90 degrees during the day and 60 degrees at night. On private lands, hunters are capable of retrieving elk conveniently but that is not the case with any public land elk hunt. The time it takes to pack out an elk at any distance in 70 degree weather is long enough for the meat to spoil. I am in favor of shoulder seasons after the hunting season is closed but early shoulder seasons are negatively impacting archery hunting on public lands. Early shoulder seasons are effective on private lands but are taking the opportunity away from devoted archery hunters on public lands. As we all know, access is the real issue here.
- 6 Bobby Sutton Sheridan MT I do not support shoulder seasons. I do support damage hunts that address elk populations only on private land that allows at least some public access
- 7 Lori westberry Hamilton montana MT I think there should be no shoulder hunts these cow elk have good size babies inside by this time. Your killing two life's I am a hunter but I do not think this should happen. Also these private property owner will not let you hunt there property during general hunting season so they should have to deal with what ever happened when the elk come in to there property.

- 8 Ian Hall Roberts MT I think that it's good for population control but I know that the area around Roberts is extremely difficult to find land to hunt. The land owners don't allow hunting inless you pay a trespassing fee but expect do be bailed out. They use the shoulder hunt as a away to say they allow hunting.
- 9 Doug Stickney Miles City MT The shoulder seasons were not successful. I do not support them 90% of the public comment was against them and yet you did them anyway. So here is my public comment falling on deaf ears. Stop the shoulder seasons.
- 10 luke griffis Belgrade MT The early shoulder season that runs from Aug. 15th- Sept 1st should be removed. It's too warm for most people to salvage all of the meat from an animal as large as an Elk.
- 11 George Quesenberry Livingston MT From the past couple of years I really feel that the shoulder season should close earlier, Maybe January 15th. This long season puts too much stress on the Elk herds and the landowners.
- 12 Vito Quatraro Bozeman MT This is a very complicated issue. First, the last Elk Plan developed by FWP clearly states on pages 55 and 61, that those elk who primarily reside on private lands shall not be counted in the objective numbers as no state management opportunities exist on private land. Unfortunately, the FWP has disregarded this language for at least 8-10 years. Therefore, we truly do not have a current working elk management plan in place and the FWP claims they do not have the money or time to develop a new one. FWP is just winging it and changes the rules as they go. Consequently, the objective numbers that are being used are flawed and totally outdated in Montana today. In some areas the objectives should be raised while in others there may be some that should be lowered. FWP needs to start by throwing out all objective numbers until a new Elk Management plan is developed!!!! Specific to the shoulder season issue the dynamics get even muddier. There are private ranches that desperately need shoulder seasons as they get overrun with elk either before or after the general hunting season yet during the general season there is rarely an elk on their lands. On the other side of the coin, there are those ranches that participate in the shoulder seasons who have lots of elk on their ranch year round but do not allow any public hunting during the general season, often because their lands are outfitted for big bulls! This second category should not be allowed to have a shoulder season hunt on their lands. The first action that must take place is to update the current Plan. Another possible solution would be to go to cow only hunting in those units that are "over" objective, on all private lands within the unit or perhaps on all public lands as well. FWP has been a big part of this problem for many year by failing to update the Elk Management Plan. Many of us have been telling the FWP to fix the plan but instead they have chosen to ignore the wording in the plan and keep changing the rules!! I personally have mixed feelings about shoulder seasons. One side of me is not comfortable hunting elk for 7 months out of the year. The other side has seen the damage elk can do on ranches that do allow public hunting during the general season. We need to help the ranchers and farmers that are trying to make a living, but those farmers and ranchers need to help solve the problem as well by allowing some form of public access. Vito Quatraro
vrq@montana.com 580-1130
- 13 Austin Wargo East Helena MT elk shoulder seasons should be stopped i believe they are making harboring worse. anywhere where people can access elk to hunt elk are not over populated. over populated elk are due to landowners not letting people hunt whether in the shoulder season or general season.
- 14 Michael Stoick SOMERS MT I believe we should stop the elk shoulder seasons and instead of killing them we should be transplanting them into regions where elk numbers are low as in region 1.
- 15 Don Cox Helena MT We need to stop shooting elk in August. The calves are barely two months old at that time. While antelope hunting near White Sulphur Springs, we saw a group of eight calf elk (apparently orphaned) bedded by the public road, with no fear of people. No doubt a product of shooting cows in August. This must stop - it looks bad and is bad. Also, if you really want to kill elk, open up all lands.
- 16 Nolan Barbisan Gallatin Gateway MT There should be a 6 point only rule. Allow the general tag to be valid for a cow or 6 point or better on one side rule. This would substantially increase longevity of our herd and increase our bull to cow ratio. No more little bulls getting killed because that's the first animal that presented a shot and

would allow meat hunters to harvest the meat they need much easier.

- 17 Sara Basso Helena MT The shoulder season should not start before archery season. It's likely more meat gets wasted due to how hot it is, and it makes it archery hunting those areas much harder. The shoulder season should be for post season only. Nov-Feb. Allowing more than one cow taken in areas would be a better solution than just allowing longer times
- 18 Ethan green Anaconda MT No rifle hunting for the shoulder tag during archery season. It's unsafe for bow hunters and not fair to bow hunters that are trying to get close and someone with a rifle shoots over them at elk
- 19 Jim nelson Minot ND Would like to see elk shoulder season added for private land in unit 201 and addition of this unit to the 260 archery late season
- 20 Andrew Vadis Billings MT I believe it's in the best interests of landowners, hunters, and conservation enthusiasts to continue the elk shoulder season. I also feel the FWP should determine quotas based on science-based carrying capacities and not subjective landowner preference.
- 21 Rik Great Falls MT Make a better call in system for hunters to access property. Many people do not have time to play the call game to get on property. Right now it's a joke. Most of the people I have talked to are not participating in the late season hunt. All of them work m-f so this call in on Wednesday starting at 8 doesn't work. I've called 104 times in less than an hour and never got through. The system now in place does not work for people and the numbers you want harvest will not be reach. The calling system in my opinion doesn't seem like a proven system in the White Sulphur Springs area.
- 22 K.D. kimzey Wise River MT Do away with elk shoulder seasons. We cant hunt the ranches where problems really exist. 5 week general rifle season is plenty long. Elk used to be treated with upmost respect in this state. Now it seems elk, and muleys are vermin.
- 23 Don Johnson Great Falls MT The elk are there, access is not.
- 24 Timothy Haymond Columbia Falls MT I encourage the Elk Shoulder Season and would love to see it continue. In areas where the elk population is stable and/or over populated, I think the shoulder season is a great way to help manage the elk as well as give hunters the chance to continue their season if unsuccessful. Sincerely, Tim Haymond
- 25 Jeff Schritz Townsend MT After reading the proposals which were put forth to the commission and the predictable opposition from the usual suspects I'd like to make a suggestion to improve elk hunting for everybody. Offer "A" tags with a regional restriction for antlered bulls (I.E 500-29 antlerless elk statewide or browline bull in ANY 500 district, 400-29 antlerless elk statewide or browline bull in ANY 400 district) and so on....EXCLUDING AREAS WITH EXISTING ANTLERED BULL RESTRICTIONS. Eliminate the early cow season (Aug 15-Archery) opener and extend all shoulder seasons to February 15 Offer B tags as needed to address the super herds in specific districts WITHOUT public/private property restrictions. Hopefully this will appease the outfitter lobby and they can stop clutching their pearls everytime FWP tries to improve the bull elk opportunities for the public. I agree the pressure on bulls is too high while cows multiply to unsustsinable numbers. By drawing all shoulder seasons late into winter cows will be more likely to abort if they experience constant pressure and reduced feeding opportunities. With the discovery of CWD in our mule deer it will only be a matter of time before our elk herds experience a rapid and ugly reduction in numbers. Hopefully some agreement can be made for the public to get into those ranches that harbor those large herds before we see devastating loss due to desiese. I hope this feedback is helpful. As a lifelong hunter, I am 100% invested in the success of our game management.
- 26 LEON B HAMMOND HARLOWTON MT I favor continuing the elk shoulder season. Sure would be nice if National Forest land was included.

- 27 Robert cordle Stevensville MT Regarding HD 217 there are too many cow elk Please continue elk shoulder seasons
- 28 MT The shoulder seasons have negatively affected the success rate for bow hunters. The amount of pressure also has ruined open day rifle hunting success. Elk are being pressured for half of the year and are relocating to different areas where there is no hunting access. Please end shoulder seasons immediately!
- 29 Chris Morford Miles City MT I fully support the extended shoulder seasons as it is a great way help manage population objectives along with providing opportunity for Montana sportsman. One change I see that could help reach population objectives is trying to open access to landlocked public grounds within deeded property. If hunters that were able to access the private ground had opportunity to hunt these landlocked state or BLM lands I believe harvest numbers would rise and the elk population would be dispersed more evenly throughout the landscape.
- 30 John Morford Miles City MT I support having the elk aoulder season extended for all affected districts through 2019-20.
- 31 Tom Juergens Gallatin Gateway MT There should not be a shoulder season in effect during archery elk season. It is stupid to have hunters with rifles shooting cow elk while archers, wearing camo are walking around carrying cow elk decoys in the same area at the same time. Common sense, please.
- 32 Peter miller Gold Creek MT I am an archery hunter the shoulder season has ruined the good archery hunting we enjoyed in the past on private property mostly on BMA's. Please consider to let the rifle hunters hunt during rifle season and the late shoulder season. Also in August those calves are only 2 months old. Are they ready for that?
- 33 christopher farmer laurel MT The current shoulder season structure should be kept in place until management goals have been met. The only change that I would like to see with this pertains to access. The shoulder season is only allowed on non-forest lands. Although state and BLM lands are huntable for these seasons, there is very little in the areas that the shoulder season exists. I have tried to obtain permission over the last 2 years to hunt during the shoulder season on private land, and have been unsuccessful. If the FWP hopes to reach management goals with these seasons and only on non-forest lands, a plan or a helping hand with access is needed. Temporary block management type access, small access fees paid by hunters to land owners, or even hunt days similar to damage hunts would be extremely useful in aiding the management objectives and the sportsmen who seek to hunt the shoulder seasons.
- 34 Lewis Cardwell Livingston MT I think having a cow elk tag that isn't good on Forrest service land isn't helping get the numbers you want so I believe you need to make the tag good every where also you need to make 393 vow tag good for only 393 and the season over there should be cows and spikes only all year long even in archery season you want to kill cows make them kill cows change the district to cows and spikes only for two years and you will get the numbers also why don't you have a pay by hunter to land owners who let hunters harvest a elk off the property like 25 dollars for them to hunt a 100 if the get a cow just a thought might help get ranchers let people on but I also believe you need to give the elk a break in between gun season and shoulder season take the pressure off them so they do come out to where you can shoot them
- 35 charles r murtagh Bozeman MT Consider opening federal, state, and WMA lands for the shoulder seasons, as the elk are using these lands as sanctuary...Thank you...
- 36 Austin Billings MT Yes
- 37 Preston Ricci Missoula MT After the general season wildlife enters into their stressful time with the winter months . I feel that by hunting them we are pushing them off their winter range and adding too much stress for them. Establish a harvest system during the general hunting season that meets managements goals. Issue more cow tags and permits . Also shoulder season starts in mid August - mid February . This is way too long to be hunting wild animals. I think shoulder seasons should be eliminated all together. I also feel we could transplant elk into other

areas that can support more elk.

38 David Yoder Gold Creek MT I believe the shoulder season is a good way of trying to reduce cow numbers, but I don't agree with doing it with rifles before October 1. It's ok to do it with bow during September but it's very frustrating when archery hunters are trying to fill their bull tags and they run into hunters hunting with rifles trying to fill their shoulder tags. It doesn't seem ethical or practical safety. Bow hunters are hunting with camo and its dangerous when rifle hunters are hunting the same area. We would greatly appreciate your consideration with these concerns.

39 John Dorne Swan Lake MT Our elk population is down , are the moose, deer and small the wolf population is up. We always had wolwvs, timber wolves, to bad you didn't know this. what bothers me is when you wake up to the problem will we loose the Timber wolves too. They are loners and only get together to breed.

40 Wilfred Dubielczyk Sun River MT Would rather only see Damage hunts where FWP manages problem properties to address actual Elk doing Ag damage .Offer early Muzzleloader season of late Muzzleloader season.

41 Bill Billings MT I think it's a great idea to extend it. It would be nice to allow the hunt to take place on public land special here around Billings since private land is hard to get permission.

42 David Langlois Augusta MT I work on Rogers Pass for the MDOT and drive the bean lake road daily. I am an avid hunter and have been hunting the Bob Marshall Wilderness and surrounding area for 27 years I have closely watched the elk herds over the years. My comment is based only on the shoulder season on the east side of region four. I have observed many elk fighting extreme exhaustion in January and February from the weather and an increase in predation I feel that hunting pressure for seven months out of the year is just too much

43 edmund langlois bigfork MT I have hunted in district 280 for 28 seasons. How are the shoulder seasons helping this decimated elk herd. I have to believe that shoulder seasons are a short term solution to keeping hunter numbers up. Would like to here why having wolves reintroduced makes the outdoor world more natural in this time period. Believe I could put forth a good a argument that it is not natural. That is if you want to keep the paying human hunter in the equation. other wise close down the Dept. of F.W.&P. and let what is left of the so called natural world take care of itself.

44 Alex Gordon White Sulphur Springs MT Maybe sell more than one elk B tag per hunter like you do in the 700 area for Mule Deer does . Six months is too long to chase elk . In the event of back to back "old fashion Montana winters " we may wish we had more elk .

45 DEAN BLOMQUIST Ryegate MT I support the current and proposed 2019 elk shoulder season. I appreciate the agency trying to manage elk numbers where needed. Additional work is needed to somehow open private lands that harbor large numbers of elk. Please consider presenting options to these landowners such as local organizations that could accompany new or young hunters to harvest cows and calves during the shoulder seasons.

46 harley lathrop stevensville MT I would like to know if the shoulder seasons are helping, specifically during the August rifle cow hunts. I wish that the August rifle hunts were canceled, I do feel it greatly affects archery season, cows being shot at in August I feel has put the elk on a rifle season alert affecting there patterns and prematurely pushing them to different travel routes not usually taken up until rifle season. I have participated in 4 damage hunts that have ranged from December to February and I feel those are very effective when it comes to actually harvesting cows and helping reduce numbers with out effecting bow or rifle hunting seasons. I do on the other hand trust fish and game and respect all you folks do. At the same time I would love to see no August rifle hunts for cows on private lands , I am in the field for at least 25 days each archery season and since this hunt began I feel it has drastically changed elk behavior. I hunt unit 210 and 216. Thank you for all you guys do.

- 47 Nate Thompson Butte MT Please do away with the cow season in HD 340, it has absolutely destroyed that area. I hunted about 25 total days between archery and rifle and this was the lowest amount of sign I have ever seen in that district (15+ years). If the elk numbers are above target, they are grouping up on private land where landowners do not allow access, primarily around Divide. If a landowner is mad about an abundance of elk on their property, they should allow access. But including elk in HD counts that primarily stay on private property does no one any good, when landowners limit access to those elk.
- 48 Peter George Helena MT From some one that spends alot of time in the field, this needs to be reevaluated. I spend apx 60 plus days a year in the field in a district that is between 2 shoulder season districts and the elk population has dropped from 300 percent to less than 10 percent of sustainable levels. Over harvesting in the shoulder season districts is greatly affecting the neighboring districts in a negative way. It will be years before there is even a huntable population in my district.
- 49 Gene King Libby MT I'm really surprised FWP is on board with the late season. The elk are being pushed from August to February. Then they have to endure winter. I love hunting, especially elk but that seems crazy when calves are involved as well. I guess if the end game is dead elk whatever means necessary then it makes sense. Other then that seems excessive to me.
- 50 Tyler Roylance Charlo MT I think the over the counter shoulder season tags should not be broke down into reigons. you should be able to hunt more then one reigon as long as you do your hunting on private ground to help the ranchers.
- 51 Eric Rolshoven Florence MT Keep the shoulder seasons going, best move FWP has done in years. I have shot cows in August and just two weeks ago in December. Many times the elk we hunt don't come off the sanctuary ranches till late in the year. We also really like the mass cow tags in all the zones. I can then hunt multiple ranches for cows in a much larger zone.
- 52 Paul Tunkis Livingston MT If you actually want to reduce elk numbers in 393 DROP the damn shoulder season with its private land only restriction and go to a elk B tag, just bow and regular season, for ALL lands in the district. IT IS IMPOSSIBLE TO FIND ACCESS TO PRIVATE LAND BECAUSE MOST OF THE AREA IS OUTFITTED!!!!!!! OR THE LAND OWNERS, THE SMALLER ONES, WANT THE ELK FOR THEIR OWN USE OR LEASE IT TO SOME SOB FROM TEXAS!!!! This would be obvious to anyone trying to hunt this unit since the Willow Creek Ranch (an area roughly equal to half the district is outfitted and most of the elk on the south end of the unit spend most of their time on Willow Creeks or adjacent private leased or outfitted land!
- 53 Gary Richtmyer Florence MT Against shoulder season. Elk are pursued and chased 7 months. Elk have little time to gain needed reserves to make it through winter. Disheartened by fwp agreeing to shoulder season that benefits large land owners. Shameful native Montanans hunter from time I could keep up with my dad
- 54 Nate Messer Helena MT I never have or never will participate in the shoulder season. It's a political move that has failed.
- 55 Shawn Heyer Superior MT I think that shoulder hunts are a valuable tool to help manage game population's I also think that we have way too many wolves in the state and should be allowed to shoot them like coyote's
- 56 steve schindler glasgow MT abandon all shoulder seasons and rewrite the elk management plan with new reasonable objective levels
- 57 David Bradley Glasgow MT I believe the shoulder season should end on December 31,2019. Allowing an additional 45 days is silly, put's to much stress on wintering animals. Also, why not allow private landowners to let hunter's use a rifle on their properties during archery season for cow elk if they so choose?

58 Dick Ipad Grass Range MT Eliminate shoulder seasons

59 Adam Jimmerson Billings MT Thank you for keeping the shoulder season open. It would help if for the early season that requires hunting on private land if you could have information of who would allow hunting. Similar to the block management areas.

60 Mike Mershon Billings MT The hunt units that private land owners are wanting shoulder seasons to happen in need to have a access plan put into place BEFORE the hunts are allowed to continue. A list of land owners who are in favor of these hunts need to be established and then these land owners MUST in roll in the current block management programs. There needs to be a minimum amount of land enrolled into the MBA program in each hunt unit before it can be considered for a shoulder season hunt. There must be some sort of regulation to alleviate the commercialization of these hunts, if these elk are needing to be removed from these properties then they need to allow access during the general season and they can not charge fees during the shoulder season. Quite frankly it is infuriating that land owners do not allow access during the general season and then complain about elk numbers afterwards. As an aside, perhaps we should look at increasing public grazing fees to create a fund to help pay for winter crop damage.

61 Terry L. Zink Marion MT I believe the elk shoulder seasons are the wrong approach to elk hunting here in Montana. We need to address why property owners that allow shoulder hunts in August and then after the general season is over most generally do not allow hunting during the Archery & general season. My thought is if they do not allow hunting during archery & general season, then do not allow them to hold a shoulder hunt. It also bothers me that there are property owners that charge during archery & general or lease to outfitters. We need more elk not less elk. We could also help the elk out tremendously if the nine Canadian gray wolf weren't a game species used for revenue, the wolves belong in the same status as is common coyote.

62 Mike Kummer Bozeman MT I believe the shoulder seasons are appropriate in certain HD's however in areas where hunting access is extremely difficult I do not have a good solution it is a difficult problem. I do believe allowing of shoulder seasons on forest service would be a huge mistake as the Elk patterns have dramatically changed to where there are fewer and fewer Elk on Forest Service and increased pressure is going to make it worse. I do like ideas of cow only hunting in the over populated / Difficult access areas to hopefully get outfitters / landowners to hopefully begin talking on a solution for access to allow population control

63 Phillip Ley Belgrade MT I appreciate the late season hunting opportunity that shoulder seasons provide. However, I think the issue is not the number of tags, but lack of access. I've hunted unit 411 for two years during the shoulder season and my friends and I were very lucky to gain permission on a property where we harvested our elk. Otherwise the elk were always found on the Wilks ranch. I understand FWP is aware of this issue, but this has been my experience with it.

64 Nuridia Nulliner Missoula MT I really enjoy the Elk Shoulder hunt because it gives my family an opportunity to get a cow. This is very helpful because we have such a hard time getting a bull during the general season. I have yet to get my first elk so I rely on shoulder seasons as an opportunity to fulfill my dream of getting an elk as well as providing myself and my family with meat. My father and I are willing to walk many miles for a cow. I think the shoulder season is just fine how it is. We hunt in 217. Access can be an issue at times, especially when the herd is constantly on the same property for a couple weeks and does not come off. They are not getting pushed off, so they have no reason to be where people can get to them. Maybe improvement of access could be helpful, but I do not think the shoulder season needs to change much.

65 Paul Olson Wise River MT I think we are hunting elk for too long a period and that has to having an affect on their condition especially pregnant cows hunted in January and February. I would like to have the Department consider extending the general hunting season by a week or two depending on the hunting unit and snow conditions moving game. It seems like weather conditions are getting so out of norm with snow not pushing elk out of the mountains, making it harder for hunting and the Department not being able to meet harvest quotes. Thank you for the opportunity to comment.

- 66 Kevin Kelly Anaconda MT I hope that the shoulder seasons are based on science and not land owner influences. Your shoulder seasons are decimating our already wanting ungulate population. What model do you use for predation #'s.
- 67 Ed Bukoskey Rosebud MT Large or small farms/ranches that offer very limited harvest of elk should have their numbers taken out of the quota total. These elk will never be able to be harvested by "Joe Blow" public. Affected neighbors later can request a damage hunt.
- 68 richard o haire clyde park MT do away with shoulder seasons and go back to drawing for cow tags so there aren't so many people hunting and the chances are much better in the 90s we used to draw for cow tags and success were great and the elk weren't constantly being chased to where they were tough as leather and not worth killing like late in the shoulder season.when you drew a cow tag in the shields valley all the ranchers would allow you to hunt now there are only a couple ranches that will allow hunters like arthuns and there are so many people there its not even safe and when they shoot at cows its a slaughter and flock shooting and many run off to other ranches and die,i know a ranch hand that borders arthuns ranch and he collects at least 15 dead elk that ran over from arthuns.he uses a tractor and dumps them in a pit.End the shoulder seasons and have late hunt cow tags please
- 69 Mark Bryson Helena MT This year the shoulder season will probably have a low harvest. one of your commissioners suggested that the hunting area be opened for national forest. The snow or lack of it has not pushed the animals onto private land like it would be in years with more snow and cold. The sportsman are more than willing to put the time in but in time if they are unable to get to the animals the shoulder season will not draw interest. Another that you not pursued is opening the season later and keep the general season open into December. Think outside the box for options. what you are currently doing is not working. Anyone that has done much elk hunting knows that snow and cold weather usually ensures a higher harvest rate.
- 70 Dorgan Larner Philipsburg MT I think that the present shoulder season will work better and with less cost than the damage hunts.
- 71 William Stenger Shelby MT Hi, I elk hunt in 401 and have watched the elk numbers rise every year. I killed a cow on the second to last weekend and the herd she was in had about 400 head in it. The amount of private land there makes it difficult to control their numbers so why dont you have a longer season to help get rid of some animals? If you have any questions please call me 4064702884 Will
- 72 Justin Zabrocki Billings MT Early seasons are a horrible idea and have all but eliminated some archery opportunities, the idea that elk population is a season problem is wrong it is a acseac problem . Shoulder season just allows longer lockup and more privatization of public wildlife. Quit paying damage to limited access private land . Shoulder seasons do nothing but push the elk to the private sanctuary sooner. Access is the key to control the public wildlife.
- 73 Richard Hjort Libby MT The shoulder season is fine for areas that have elk but what about areas that have LOW numbers of elk because of the wolves that the Fwp DON'T manage ,why do we have so many breeding pairs .who is managing the game in Montana the anti hunters?
- 74 Lance Hughes Hobson MT Shoulder season should be added for region 420
- 75 CHRIS MCFADDEN TOWNSEND MT I feel the majority of the blame needs to be put on the landowners who are caught up in the commercialization of our hunting. Cow only in these districts will give the landowner an ultimatum. It could be set up on a system where depending on the percentage of public hunters (allowed to kill bulls and not picked by them) they let in determines the amount of bulls they can kill through outfitters. I realize outfitters money is lined in the pockets of FWP but it's time they make a stand and be the voice for Montana hunters.

- 76 Parker Plains MT I think if the elk are bad around the Drummond Phillipsburg are bad that people with general tags can go and hunt all the shoulder units.
- 77 Brandon Reintjes Missoula MT Despite my strong interest in participating, I have had difficulty doing so due to complicated access, landowner preferences, and the complications of navigating the regulations. I still hope to successfully shoot a cow this (2018/2019) shoulder season and am grateful for the opportunity to continue hunting.
- 78 Dwain Hoover Helena MT I think it's a bad idea: 1. It seems to be the landowners that do not allow hunting during the regular archery and general seasons. 2. I think we're going to see a big decline in population in a couple of years because the cows that are being taken are pregnant and now folks are harvesting more due to the longer season. Anyway that's my 2 cents. Thanks for the time to comment.
- 79 Dan Gagner Helena MT I absolutely do not agree with any elk shoulder seasons. My personal opinion is it's just too much to have an 11 week archery/general season, then keep hammering cows into February. I'm also EXTREMELY frustrated with how private ranchers and landowners either block off public access or don't allow public hunting in these over objective units, then complain that the elk are eating up their cattle range and damaging their fences. Unit 580 is a perfect example. You have private landowners who are on record saying that they should be able to cull as many cows as needed and that public hunting will not remedy the situation, yet sit there and sell bull hunts for thousands of dollars and harbor hundreds of elk. So fed up with that. If anything, these elk should either be excluded from the population objective or the management plan should be updated to reflect an appropriate elk carrying capacity. It's just frustrating when Colorado has 2/3 the land as us, but over 100,000 more elk and doesn't have near the private land refuge issues as we do. Plain and simple, if landowners are complaining that there's too many elk, then enroll in Block Management, that's what it's there for. Doesn't need to be any more complicated than that...
- 80 Paul Henze Deer Lodge MT I understand why we have the shoulder season, but for the life of me cannot wrap my head around why we are chasing elk on state land and BLM lands. It should be targeted at only private lands, and do a earn a bull tag for private lands. Where you have to shoot a cow first before you can shoot a bull.
- 81 Thomas Eastwood Belgrade MT I am opposed to the shoulder seasons as currently in-place and proposed for 2019. Understanding that elk numbers are over objective in those hunting districts, utilization of the hunt roster may provide a better means to manage those elk numbers. The hunt roster process would be a far more effective method of focusing hunters where the elk are and when in combination with the needs of the agricultural producers that seek to have the elk numbers limited.
- 82 Keith Fisk Pierre SD Please continue the shoulder seasons as they are a great management tool and as a hunter and conservationist, I strongly support this concept. Please continue to utilize hunters during these extended periods to lower elk populations in areas where numbers are too high. Thank you for your hard work, commissioners. Best Regards!
- 83 Jennifer McAnally Helena MT We need to manage the numbers & if we can do that with shoulder season, then we need to use that tool. We need increase numbers taken during the regular seasons and this is a problem of access. Many willing and ethical hunters are not filling tags because they can't get access without big fees to do so. Work with the landowners because having more time to watch the elk from the road during a shoulder season is also not managing the herds.
- 84 Tyler brothers Salmon ID If elk herds are over objective population then you have better options then shoulder season. 1. Make a 2 tag season for elk first elk that is harvested has to be a cow in a over populated zone. 2. Introduce wolves into areas to that have high numbers of elk, that would make the private land owners think - humm let public harvest cow elk or have a issue with wolves and livestock not a good idea. Set up a program that pairs up hunters and landowners that is more connected then block management. When hunters obtain elk tag they are paired up with ranches that are over objective. They build relationships and keep sportsman on the good side of private land owners. Yes this will cost money to manage but it's cheaper then helicopters to shoot them. If landowners refuse to let hunters keep

elk to the objective then land owners don't get the help or support from crop damage or fence damage. Let elk be elk for 9 months a year. This solution should come from public not the commission. Thanks for your time

85 Eric J Bashore Billings MT The present MT FWP elk "shoulder season" is totally ineffective for managing elk populations and I do not support its continuation – I believe the public sentiment was 9 to 1 against the elk "shoulder season" the last time public comments were solicited a few years ago, yet it was nonetheless approved via rubber stamp. As stated then, all it does is further concentrate elk numbers on larger private ranches that harbor large elk populations for future economic gain via high dollar guided hunts for bull elk. Also, it is ridiculous and immoral to allow hunting into February when elk cows have growing calves inside them. The MT FWP has done absolutely no effective outreach in Region 5, and as a result the elk "shoulder season" is totally ineffective and unsupportable, in addition to the other reasons mentioned above.

86 Theresa oneill Bozeman MT Not needed give the elk's rest focus on preserving and conserving not serving the wealthy listen to folks who have been here for generations the true locals

87 Jess Wagner Lewistown MT If we are going to continue to have shoulder seasons then changes need to be made to the current system. I'm sure you can agree that the over objective elk populations stem from lack of access. We shouldn't allow landowners to have shoulder season hunting take place on their land if they aren't allowing access during the general season. Some places aren't allowing public hunting during general seasons and then turn around and guide or charge access fees to cow hunters during the shoulder seasons. This is a complete abuse of the system. I also think the August seasons should be for private land only. This might even move some elk onto public and make for a higher harvest during archery seasons. Instead of managing elk based on landowner tolerance, management could land somewhere in the middle of landowner tolerance and science based management. I believe the objective in 411 (which is one of the most over objective units in the state) is around 800. That seems to be low in my opinion. I also believe there's a portion of the elk management plan that states that elk that aren't accessible to public hunting shouldn't be included in the elk counts. I question whether that portion of the plan is being utilized for 411. I also think that going onto the public in the Durfee Hills for parts of the year should make that herd considered as "accessible" since it is only accessed by a limited number of hunters that fly in by helicopter or plane. If management was more science based I don't think there would be nearly as many units that are over objective.

88 Gary Thompson Missoula MT If they're having that much problem start transplanting them to areas that are hurting on elk numbers. They do it with big horn sheep and it works. It's a better idea than killing unborn calves during December thru February hunts. Thanks. Just my thought.

89 Buzz Hettick Laramie WY Thank you for the opportunity to comment, but as per usual, I feel the comments submitted by the public will likely be largely ignored. My reason for making that statement is a result of the first round of comments received when the shoulder seasons were first proposed. A clear majority of comments, both written and in public testimony, were NOT in favor of these shoulder seasons. Yet, in spite of the comments received, the shoulder seasons were adopted anyway. Much the same as the elk "B" tag proposal as well. I have never been supportive of the elk B tags for several reasons: 1. They don't work in areas where large landowners don't actively participate in allowing the public to hunt. Elk are very sensitive to hunting pressure and continue to seek out the refuge areas and harbor where they are not being hunted. 2. The use of unlimited B tags in areas like region 2 are a gift that just keeps on giving. Even though the elk b tags are to be used on private land only during shoulder seasons, elk are being killed with the use of these tags on public. With barely one warden per county, enforcement is almost impossible and the unscrupulous know it. 3. I have seen ZERO increase in elk being forced onto public land through the utilization of shoulder seasons. The main problem with elk not using public lands is the 6 week general archery and 5 weeks of general hunting pressure. The MTFWP has done nothing but increase pressure on public land animals as long as I've been hunting in Montana (every year since 1979). This is in spite of horrifically low bull to cow ratios, severely declining calf/cow ratios, and over-all declines in elk numbers on public land. The proof of this is apparent in the elk population estimates for many areas in regions 1 and 2 in particular. Pretty sad when flights in the Bob Marshall complex find 208 elk with bull to cow ratios of 6/100 and single digit cow/calf ratios. Yet, we now have unlimited B tags and shoulder seasons in some of the areas that elk from these areas move to for wintering. Finally, I don't understand why public comments are ignored and frankly why the FWP even seeks input. It should be intuitively obvious that elk hunting

in most public land areas is really bad. This should come as no shock as the numbers being reported by the MTFWP, both harvest and population estimates, paints a very clear picture. Finally, for years and years the MTFWP has waged war on elk in many areas of the State. First through the use of cow permits, flooding areas with harboring problems, but allowing cow elk to be hunted in the entire units, rather than focusing harvest on the private refuges that harbored elk. This in turn put huge amounts of pressure on the elk utilizing public, in short, the wrong elk were killed off (those that spent a majority of their time on public). Meanwhile the elk continued to flourish/harbor on private. The elk hunting in most of Western Montana, including the area I have hunted every year since 1979 (region 2), is so dismal that I stopped purchasing NR native elk licenses 3 years ago. It wasn't that I couldn't kill an elk, just that the horrible bull to cow ratios and declines I witnessed didn't warrant me shooting one. In fact, the last few bull elk I shot, left me feeling guilty for doing so, with such horrible populations and bull to cow ratios. So, out of respect for what little is left of the elk inhabiting public land, I have quit buying NR elk tags in Montana. I refuse to be complicit in essentially trying to remove elk from public land, nor will I support, financially or otherwise, a Department that refuses to provide science based management. The only thing that's changed management wise since I started hunting in 1979, has been longer and longer elk seasons and increased over all pressure. The result is less and less elk on public, more and more elk being harbored on the few places they don't get pressured (private land). For these reasons, I am 100% opposed to continuing the elk shoulder seasons at all. Further, until the MTFWP actively does things to support and improve elk hunting on public land, I will never purchase another elk tag there again. In closing, perhaps Montana should look to how Wyoming manages their elk, in particular on public land. They don't wage war on elk for 11 weeks in their general areas, have bull to cow ratio's in all their general areas in the 25/100 post harvest range (some as high as 49/100) and enjoy high hunter success rates. Management makes a difference.

90 Michael drake Polson MT What to know areas

91 syndle ryan great falls MT If the herds are to be managed hunters will be more happy to manage them . Access is the problem. Mtfwp needs to work with landowners to provide access. My suggestion is to give quotas to each ranch, provide access through bmas, until quota is met; or no damage fees will be given to ranches. If the private land owners want the elk herds managed , they need to give access to hunters. Access needs to be given fairly to the general public.

92 Ron Hawkinson Thompson Falls MT Only on lands that are open to hunting during the regular season. Private land that is not available to hunt during the regular season should not be in the shoulder season. Land owners that shoot bulls for a profit and do not allow public hunting should pay the consequences for their public resource.

93 Kevin Larson Lewistown MT Please stop the shoulder season. The general season is long enough to control elk if the landowners would help out. 6 months of cow elk hunting is to much! The stress of non stop phone calls for the landowner, and the stress it puts on these animals. If the landowners can't figure it out, let the herds grow. I love elk!

94 Mike Hedden Helena MT I think the shoulder seasons are wrong and unnecessary we already have a game damage hunts set up to take care of problems we don't need a shoulder hunt with no control going on to make a few big ranchers happy after they get done selling hunts for big bulls and then don't want to have cows eat any of there grass after they have grazed their cattle on public land all summer I am opposed to any shoulder season

95 Sawyer Johnson Elliston MT I am in full support for continuing shoulder seasons as they have been the past few years. I personally see elk moving across the landscape more than before shoulder seasons were put in place. One issue I see with the effectiveness of the shoulder season is landowners allowing permission to hunt. Ranchers that dislike elk on their property but refuse to allow hunting seems to be the main problem.

96 Greg Munther Missoula MT "These comments are intended to address the continuation of "Shoulder Seasons". I participated as an interested public when the FG Commission approved the first shoulder seasons. I understood the political atmosphere tainted decision process. The premise for the Shoulder Seasons is that Montana supports too many elk in excess of the less than 90,000 prescribed in the 2004 Elk Management Plan. However, despite being pointed out by myself and others, the Department and Commission appear to ignore the following direction within

the Plan. Page 55 2004 Elk Management Plan 5. Elk populations in portions of some EMUs may be almost entirely inaccessible to hunters during the general hunting season or accessible to only a few hunters. To avoid over-harvest of accessible elk on public lands or private lands open to hunting, the inaccessible elk may not be included in objective numbers. Trend count number objectives may include only elk normally accessible to general hunting (if they are a distinct segment), though hunter access negotiations will continue. Elk occupying these “refuges” may be counted separately where practical (if they are a distinct segment) and sub-objectives established that could be operative if access negotiations are successful. If significant harvest of these “refuge” elk is possible with special management at some times and locations, they should be included in objective levels. Frankly if the Department and Commission rightfully applied this page 55 EMP direction against the existing elk numbers in many Hunting Districts, the elk number objectives in these Hunting Districts would not be exceeded and therefore no Shoulder Season would be justified. The Department and Commission cannot rightfully choose one EMP Direction while ignoring other EMP Direction. I urge the Commission to weigh continuation of any Shoulder Season against this Direction. There are other aspects of Shoulder Seasons which I and other sportsmen object to. 1) Shooting lactating cow elk with 2 month old calves in mid August is unethical. There is no documentation that evaluates survivability of orphaned calves through a normal winter. In fact, the condition of elk going into winter may be the most important factor to winter survivability. Such tactics would certainly not be acceptable to many if most non-hunters. 2) Shooting elk belly deep in mid February snow is unethical and would not be considered to be acceptable to sportsmen in other states, and certainly not to non-hunters. Likewise shooting cow elk carrying 5 month old fetuses would not be acceptable to many non-hunters. 3) Perpetuation of shoulder seasons is shifting many hunters to Prefer shoulder season hunts over general season hunts because it can be much easier. Over time hunters will be so conditioned to shoulder season hunts they will object to their demise. To keep the Hunt in Hunting, rather than just Killing, we need to end Shoulder Seasons ASAP. 4) Perpetuation of Shoulder Seasons is lowering the bar of ethical hunting in Montana. It is relegating elk to pest status, and the Department seems to accept and promote anything goes to kill elk. I find that the Department and Commission is complicit in decline in hunting ethics to be appalling. It is hard to understand why the Department has not been able to complete statistics as to how much of the annual elk harvest is occurring during the general season(at least 50%) as a criteria to continue Shoulder Seasons. "

97 Mark Natale Townsend MT I oppose the continuation of shoulder seasons. The management of elk should be done during the regular archery and rifle seasons, and elk should be free from hunting pressure outside of these regular seasons. Take care of areas receiving damage under existing damage hunt rules.

98 Erik Rehm Billings MT Land owners are still unwilling to allow hunting, I still see it as a way for the continued privatization of hunting and pushing out people doing it for meat and their family's. The shoulder season should stop to see increased elk on public lands.

99 John E. Kissel Corvallis MT STOP IT! No need.

100 Benito Burlington WA Have nothing but positive things to say about hunting in Montana.

101 Victoria Burlington WA Would love to hunt in GMU 416 again

102 Richard Kirishian Spokane WA when does shoulder licenses go on sale? when does Big game combo licenses go on sale? thank you Richard cell #509 998 3375

103 Raymond wedde Helena MT Would like to see an antlerless tag issued in any HD that has block management that would have to be used first before harvesting a bull

104 Daniel Musfeldt Billings MT Scouting 530 and 590 for elk herds this last season, I saw more elk in those two locations than in past years on private land moving onto public land. I also had alot of calls for damage hunting as well. Populations look healthy fro and our point of view.

105 Rick Ellis Bozeman MT The whole shoulder season idea is CRAP. All you're doing is rewarding these puke landowners who don't allow public access any other time of the year. Let the elk eat them outta house and home for all I care. If these land owners aren't signed into Block management then there should be NO

shoulder season. They are supposed to allow public access and the only way to track that is through BM. I'd rather see more either sex districts than keep rewarding these tight ass landowners. The whole shoulder season thing SUCKS. REWARDERS FOR NOTHING

106 Mark Reiling Minneapolis MN I own the Sapphire Ranch (south of Lolo) located in the shoulder season zone. I am opposed to it because I do not believe in the underlying supposition that there are too many elk. That said and knowing you are going to continue the program, I request the season start at the same time as the general firearms season. It can end at the same time you have it in February. My neighbor has August and September hunters affecting the elk psyche, while I and my Block Management hunters are diligently archery hunting. We do not need the elk to be extra wary going into the archery and rifle seasons. I already had trespassing and poaching problems and this six month shoulder season provided cover for these lawbreakers to be out with rifles. Shrinking the schedule on the front end would save me problems and still leave hunters plenty of time to harvest a cow elk. Thanks, Mark

107 Eric Johnston Dillon MT As a hunter I disagree with the shoulder seasons. If landowners wont open up, and elk are overabundant, let it be there problem, we shouldn't be stressing our elk this much.

108 Russell schaeffer Lewistown MT Keep the shoulder season the same as the 2018 hunting year

109 D Anaconda MT I vote no There is no excuse to hunt anything for a straight 6 months Soon Mt residents will have to apply to hunt any elk In my opinion the nuts making the decision to hunt this elk are controlled by land owners that the elk are on and eating their precious grass where some allow hunting but most don't There is no way people need to shoot all those elk plus the predators that utilize them End this before Montana gets a black eye when someone videos a dead elk with the calf in her Stop it

110 Brian Robbins Anaconda MT I am opposed to the shoulder season structure and have been since its inception. Elk numbers on public land have been consistently trending downward over the last 10 years and continue to do so. I believe the shoulder season is further leading to that decline. I don't believe the shoulder season is reducing overall elk numbers but drastically reducing available elk numbers. When those available elk numbers have dropped so low, what's the next step? I believe FWP is quick to say "the elk management plan requires us to reduce elk numbers" but then is very hesitant to utilize the rules of the EMP on page 55 to not include elk that typically reside on lands inaccessible to the general public. I'm especially opposed the shoulder season opening on August 15 and through archery season on accessible BMA lands. One area I hunt is USFS land adjacent to a BMA, this was the worst year I (and most people I talked to) in terms of elk numbers on both the BMA and public land. I attribute this to the fact that the BMA was open during archery season to rifle hunters for antlerless elk. There was enough pressure to run the elk completely out of the area. I don't know what the answer to the declining public land population is but I don't believe 6 months of hunting is the answer.

111 Chad christensen Dillon MT There should not be a shoulder season. Stop catering to the private land owners. U are suppose to manage public land. Really ridiculous at this point. Corrupt bullshit

112 Chad christensen Dillon MT I already commented but, do whats right for the public land hunter and the public lands. Make it general tag bull or cow. In the general season. Landowners can participate in a true block management during the season or hell with them.

113 Dick Shockley Gallatin Gateway MT It has been reported that outfitters and property owners are charging fees for guiding and/or access to hunt during the shoulder seasons. It was my understanding that part of the rationale for shoulder seasons was to open increased public access to harvest elk. Now the program is just another increase in commercialization of wildlife under the false pretext of reducing elk numbers to the socially derived tolerance objective numbers. It saddens me to view the results of this method of "wildlife management".

114 Tara Kurack Missoula MT I disagree with Montana's Elk Shoulder Seasons and I don't want them to continue. I am not the only hunter who feels this way. Below I have left a link to a discussion, from Randy Newberg's hunting forum, regarding Montana shoulder seasons. I highly recommend FWP read all of these comments.

Users bring up many of their grievances with the issue at hand. I would point specifically to a "re-post" by user BuzzH that is an original post from BigFin (Randy Newberg) and his thoughts on the shoulder season.

<https://onyourownadventures.com/hunttalk/showthread.php?286819-Looking-for-shoulder-season-help-in-region-4>

115 Tony Piscopo Corvallis MT We hunt in units 530/ 590 and find the shoulder season for cow elk a great tool to manage the amount of elk on private lands. I hope the Department continues to have this season into the future

116 Fred Upchurch Stevensville MT I participated in a hunt on December 8 & 9 on the Catlin ranch near whitesulfer springs. I appreciate the opportunity, however, I feel it was miss represented. We were told that ranch was not hunted since the end of general season. We encountered multiple truck tracks and gut piles on 3 day old snow. We covered 30 miles by GPS on horse back and uncovered about 50 elk, that had left the ranch. We feel miss lead.

117 William Hill Anaconda MT Next to your either sex elk season in 332 last year the shoulder seasons put to much stress on the Elk. Do away with them and your either sex elk seasons

118 Adrian Potter Belgrade MT Get rid of it. There are several very sound reasons that have been discussed over and over but to me this one main point is that it's not fair chase when the elk are hunted 5-6 months of the year.

119 Greg Scheeler Helena MT I'm against further shoulder seasons for elk in MT. The data is showing growing elk numbers in the targeted regions and this will continue due to landowner access issues. We need more targeted hunts while the cow elk are actually damaging crops in August, very targeted hunting of cows from 12/1 - 1/1, and zero elk hunting after 1/1 when survival is difficult without being shot at . Landowners with large damaging herds will get help dispersing and reducing animals while they are actually grazing standing crops in late summer, but not after 1/1 when they are PREGNANT just trying to SURVIVE a harsh Montana winter. FWP recommended that horn hunter not go afield in early March the last few years so they don't bump the animals and cause hardship, but FWP was perfectly fine hunting them with snowmobiles in 3-4 feet of snow up to March 15? This shoulder season is immoral and was supposed to be a quick fix to the larger problem FWP faces of unrealistic elk objective numbers that were set by the same large wealthy landowners that are harboring the elk! Your objective numbers are obviously way out of place, maybe because they were set by political influence and not the biologists you hired with the MT sportsman's dollars? FWP needs to re-set the precedent that landowners will get relief from elk herds if and only if that landowner is willing to play by the same rules as everybody else and allow hunters to access their property during our extremely liberal general season. If they allow access they then would qualify for game damage hunts when crop damage is occurring. I'm not even sure why we are shooting elk that reside on USFS property all year except the harsh winter months when they are eating stubble, not standing crops. These elk are for the public held in trust by the state, not for the wealthy to decimate populations through political influence!

120 scott sutherland great falls MT this is a joke, 3 years and cannot get on a ranch to hunt. Seems like only people I know who got on, knew and had access which the average sportsman cannot. Many large landowners did not allow access, and the whole month of December elk were available to hunt in National Forest....but no, take away the one place where joe average can hunt. Tried to get on Galt, Strand, Dana, Sieben, Macdonald....with no success. I could see if it was 1 year, but 3 straight years.

121 Seth Wheeler Great Falls MT Against Shoulder Seasons! PLEASE MT...for the sake of those of us that do not have access to private ranches to hunt elk during the regular season (archery and/or firearms), please stop destroying our elk herds. These herds are not being managed for unit carrying capacity, but rather on some fictitious EMP #. Please stop destroying our elk herd and allow them a break...having to be hunting for 6 months / year is ridiculous.

122 George Withey Florence MT I believe the elk shoulder seasons are too long. Over harvest would be detrimental for future health heards. I also think having the shoulder seasons during the archery season is a very poor idea. Bow hunters hunting public lands wear camo and should season hunters can unknowingly over lap unto public lands creating a potentially dangerous situation

123 steven peters philipsburg MT should not be restricted to private land only.

124 Frank krebs Hardin MT Very upset, I live in Hardin , our whole north valley is open for antlerless elk but no where to hunt ,I hope you are not giving these greedy land owners money for so called damages when , in turn they do not let anyone but there high paying clients on there land, Montana has taken the ,take your family out to hunt , into pure greed ,,,,,,hunting has become pure money hungry state, I see big lease'er hunt other private and state lands before they hunt there own, what does this sound? It pushes the animals off the land and on to there's where I as a hunting can't go,,,,,,, will attempt to find out what land owner's are being paid by the state for socalled damages when they are really only feeding there own pocket book by leasing out there land for huge profits. Thanks for taking your time in reading my concerns, Ps would love to take part a state comment get together,, Took part in one in billings 25 years ago , when the wolves were introduced wolves totally destroyed the late season hunt where you could take your young kids to hunt their first elk, and then enjoy a night in gardener,,,,sorry taking my oppunity to unload

125 dwight witt alberton MT i would like to see the shoulder season expand to be near private land to help reduce the amount of elk that go on to the private ranches,i think that would help because they head back to forest service land when it turns day light any way.

126 James Helena MT Please stop these abominable "seasons." Even though I'm an elk hunter, I find it unconscionable that we're allowing elk to be hunted for six months of the year. It's questionable that we're still doing the five-week season that was in place in the 1950's. I'm sure you've heard it from others and may be likely quick to sumarily to dismiss this comment, but elk hunting quality on public land has been rapidly declining. In my opinion, the States are too quick to step on the accelerator (e.g., implementing shoulder seasons), and are slow to respond to declining populations. As a sportsman and professional wildlife biologist, I am adamantly opposed to the continued use of shoulder seasons. Thank you for considering my input.

127 Michael Kubas Great Falls MT I believe the current Shoulder Season Structure is too long. I believe that a 4-6 week extension to the regular season would be a much better structure. Having hunters chase pregnant Elk every day on their winter range is simply too much pressure on the Elk during a time they need to be conserving energy. If we need to push Elk numbers down to objective, simply issue multiple tags in a more compressed time frame.

128 Carla Williams Livingston MT It was last year requested several times that we also be allowed to hunt the shoulder season on Public land. We would like to request this again.

129 Spencer Lawley Livingston MT My main concern is ensuring the populations of elk thrive and are at robust, sustainable levels. If the shoulder season hunt encourages and facilitates that, then it should continue, or be expanded. Conversely, if the data suggests that it's overly stressful on the animals then it should be adapted and reduced or eliminated. Additionally, if the opportunity continues and needs to be increased, the state should work to allow hunting on Forest Service land to increase opportunities and more distributed pressure on the animals.

130 Mike Maland Port penn DE Stop the madness your destroying Montana's reputation of good hunting!

131 I just finished an unsuccessful elk shoulder season hunt in Montana. I found the elk early the first morning of my hunt, 400 head parked on private land. Unfortunately the owner wouldn't allow access, I suppose that's why the elk were there! It's frustrating driving 14 hours each way only to find all the elk in the unit are 300 yards from state land. Some private landowners were willing to allow access, but most were not. One landowner with a \$50 million dollar ranch seems to be hosting the elk herd in 422 for the winter. I also found public access points for the existing state lands in the unit were fairly limited. There were only a couple of points where public roads intersected state lands. It seems like you're going to have to work with private landowners to allow for hunter access if you want the elk herds reduced. North & South Dakota figured this out a decade ago: Private Land Open to Sportsmen (PLOTS).

132 Joe Ruprecht Columbus MT Management should be done during the regular season. There is far too much trophy hunting during the general season versus management. It also puts a lot of extra stress on the

pragnant elk in the late season, especially during a rough winter. Not to mention the extra pressure they already have from predators like wolves.

133 Zach Long Billings MT Unless you have a family member or friend with private land access to get on to shoot a cow in the shoulder season, I feel like for the majority of the hunting population that it is ineffective to be successful on a shoulder hunt. I also think the extended period of hunting pressure on the elk is unfair to a fabulous specimen just trying to get by during the long, hard winter, perhaps changing the normal patterns and culture that these elk have had up until 3 years ago. I have participated in a few shoulder season hunts with some success, but only because I had an in on a ranch. Finding the elk on state.../public was not effective. That's my experience and thought on the matter. Something else needs to happen with the private land owners/public/FWP management to curb this problem..., or Mother Nature is going to take care of it herself.

134 Grant Petersen Dillon MT I would like Montana Shoulder Seasons removed for 2019 and forward. Season and quotas should be set on carrying capacity of all land that is available to the general public and not social acceptance of landowners that often hoard wildlife and do not allow access. Quotas and seasons need to be science based and I object to shoulder seasons based on landowner wishes especially when they charge for access.

135 Judd Long Billings MT I strongly discourage any and all shoulder seasons. The reason the elk are on private land in first place is due to the landowners not allowing hunting, which gives the elk a sanctuary. Anybody that spends time on public lands see's that all the elk have moved onto private and that leaves little elk on public. What we need is a scientific management plan for elk instead of landowner tolerance. Its the landowners tolerance elk management plan that is wiping elk off the MT landscape.

136 Chris Polkowske Billings MT Elk shoulder seasons need to be reevaluated, no they need to cease. Elk find sanctuaries on private land more and more as time goes on and these hunts help with that problem. Not to mention the money that is made from trespass fees, outfitters, etc. A lot of these elk live on public during the months of September and October. But as time goes on with these elk being shot at during the winter months more and more elk will stay on private. A lot of cows with bull fetases will be shot, bull to cow ratios will continue to decline. Etc. Lots of problems with this all out war on elk called Montana elk shoulder season.

137 Tony Shumaker Paw Paw MI Montana is a beautiful State where I loved to hunt. I no longer hunt there due to the low success rates in the regular rifle season. I believe we NR experience that due to the elk being pushed off from any piece of public land available. During the shoulder season Resident hunters are mainly hunting it and are killing 2 animals, a cow and a unborn calf that NR will never get the opportunity to hunt. We pay way more in licenses for less opportunity. Either raise the Resident licenses or give us the opportunity with more animals in the regular 8 week season.

138 Scott Driscoll Butte MT As a non land owning sportsmen I am fully against the shoulder seasons. Landowner benefits from the program far outweigh the benefits to sportsmen and women. There should be a compromise with landowners. They should not be catered too. This is the public's wildlife, it should be managed for the public. That needs to change and that change means to end the current system of shoulder season hunts. I strongly encourage reconsidering other options that value both hunters and private landowners. Damage hunts used to have the stipulation that a landowner had to allow some access during the general season. This was good, this was a compromise. Now, landowners don't have to do this. They sell hunts or lease lands for trophy bull hunts, because they know when the numbers are out of control, someone else will kill cows and they can sell those hunts too. Then there are those lands that are just too completely locked up providing safe havens for game animals. These I do not consider altogether negative. Safe havens play a part in allowing opportunity type hunting seasons and regulations. However, there still needs to be a balance. I support the cow only hunting seasons during the general season where private landowner practices have paved the path for the over abundance of elk. They have created the problem, they should have to share in the hardship of correcting it, not solely profit from it. Guides and outfitters are no more important than other sportsman and landowners are not higher class citizens. As soon as they are treated as being equally important compromises will result. All sportsman, guides and landowners want at the very least is to be treated fairly, shoulder seasons do not do this.

- 139 Kris Folland Halma MN I feel that the elk shoulder season should only be used in areas that elk are over objective from a habitat and biology standpoint. Private land owners that have a large amount of elk on their property but do not allow public hunting should have very little input. I think the State and Federal public land should be managed for a high and healthy population of elk.
- 140 Preston Kalispell MT Very bad idea. The shoulder season is negatively effecting our elk herds.
- 141 Ryan Mullan Missoula MT I am voting NO for more Montana shoulder seasons for a variety of reasons. MTFWP is supposed to be the manager of montana's big game animals, which are held in trust for the people of the state. Instead, FWP treats elk as vermin that need to be exterminated for the good of landowners. You guys are paid by my license fee dollars, which go toward managing a six month long extermination (don't call it a hunt) of our most beloved species. It makes me sick to think about. You guys should be ashamed! To new FWP employees, don't drink the cool-aid, don't buy into the culture, learn to think for yourself, make decisions based on the best interests of the wildlife and not a wealthy landowner, and dont forget who pays your salary. The extermination of our elk and other wildlife needs to stop!
- 142 Roy Sando Helena MT I would like to take this opportunity to voice my disapproval of the current shoulder season structure enlisted to decrease elk populations in Montana. I am sure that FWP biologists know more about the elk herds in MT than most people; however, it seems fairly apparent that the elk objectives are set according to social tolerance, rather than carrying capacity. I don't believe that this is necessarily a bad thing, but aren't there more effective ways of reducing the elk populations on private ground? Why are hunters allowed to pursue elk on so many types of publicly managed lands (i.e. BLM, FWP, DNRC, etc...) when the goal is to reduce the impact of large wintering elk herds on crops? I would like to see less opportunity for hunters, to allow elk populations on *public* land recover. My perception (which could be wrong) is that Montana is on track to become the laughing stock of elk hunting in the west.
- 143 Trevor Carlson Dutton MT Please discontinue the shoulder seasons. They are reducing elk herds that are found on public land in September - November. They are not fixing the harboring issue. Landowners are trying to charge for the hunts, which is part of the problem that the hunts were supposed to fix.
- 144 Timothy Mitchell St. Ignatius MT end shoulder seasons
- 145 Kent A. Bender Bozeman MT Totally against any and all shoulder seasons, always have been. Thanks
- 146 Bret MacPherson Seattle WA As a native nonresident, I appreciate the opportunity to hunt shoulder seasons to put meat in my freezer. With limited regular hunting seasons (season length and sex), late shoulder seasons are critical to managing elk populations that concentrate during early winter. I see early season shoulder seasons as an alternative to allowing move either sex hunting in September. I agree that hunter reporting should be mandatory so wildlife managers have data drives future decision and proposals.
- 147 Make it all limited entry on bulls. Otc cow. No shoulder season.
- 148 Angelo Reda Lewistown MT I would like to see the shoulder season tags moved to private land only and cut shorter in the winter. There is no reason to hunt elk into February. They need time to rest just like everything else. I think they need to be for private land only to help move them off the private land where they are causing the problems. The public landscape can hold way more elk than what it currently does.
- 149 Nathan Dieterich Kalispell MT Please consider utilizing a different approach to management of elk populations similar to what was done for the northern Yellowstone herd in the '90s early 2000's. This would provide a better experience for hunters and generate revenue for the state. This should be a permit like is done currently for cow elk in region 1 and not just an extra tag or a B tag. As a side, it's time for pick your weapon on Montana.

150 Levi Kempf Wise River MT Please eliminate the shoulder seasons for cow elk. I hunt elk every day on public land in SW MT until I fill my tag (archery then into rifle season). I can count on two hands the number of elk I see every Fall while I'm out hunting. Considering I'm elk hunting 30-45 days, that seems like very little elk. I do not hunt with ATV's or trucks, but hiking and horseback only. In 2016, I logged 300 public land hiking miles before shooting an elk in November. When I hear that units are "over objective" in the units that I hunt, I often wonder where all the elk are that are supposedly making the unit "over objective" Probably on the private lands that no one has permission to hunt. So it appears to me that the MTFWP are catering to the large, private landowners and their complaints regarding elk numbers vs. the hunting public and their complaints regarding elk numbers. Especially since the hunting public are the folks buying the elk tags and actually spending money on/financially supporting elk conservation and MTFWP. All while the private landowners are costing the MTFWP and hunting public money. Every year, I see more and more tags issued to kill more and more elk. I really think there should be more limited-entry units, shorter seasons, and no shoulder seasons. MTFWP can't actually think that slaughtering elk Aug 15 thru February is going to help bolster the elk populations, do they?!? Instead of an elk management plan, it seems more like an elk elimination plan. Also, how is it that the very landowners that complain and need financial reimbursement for the elk tearing down their fences and eating their hay, are then allowed to charge money for anyone wanting to come and shoot those pesky elk on their private land? And deny free access to those holding the shoulder season tags? No shoulder seasons in the future please!

151 Robb Gersbach Billings MT I am not in favor of continuing shoulder seasons in the same way in the future. I was not opposed to trying them out and seeing if they worked for the hunters, landowners, and elk. But after a few years it seems that they are not working as intended. People are looking to pay landowners for an "easy cow" after the season if their general tag goes unfilled. It also comes down to the emp- after really looking into the objective numbers I was disheartened. The elk should not be managed to landowner tolerance but based on science and conservation. It is sad what elk hunting in Montana is becoming. Please do not continue shoulder seasons and instead rework the emp and work for Montana's elk herds and not against them. Thanks Robb

152 Paul Johnson Laurel MT Please cease the shoulder seasons, over-killing of these cows and update the EMP to levels in line with what the habitat can support. I thought the Montana elk situation was fine until I began hunting out of state and saw what it could be. The habitat in MT appears far better than most places I've hunted in WY yet there are far far fewer elk. I am beginning to believe the \$600+ WY (or CO or NM etc) non-resident tag is a better value than my \$19 MT tag. I've begun and will continue to tell people the foolishness of coming to MT to hunt when there are so many much better options. I sincerely wish this was not the case, and I know it doesn't have to be. Again, please cease these shoulder seasons and push for an updated EMP. I will gladly sacrifice some 'opportunity' for healthier herd and a higher quality hunt. Thanks, Paul

153 Rod Williams Deer Lodge MT
https://m.facebook.com/story.php?story_fbid=2022031284558296&id=123400691088041&anchor_

154 Shane J Germann Billings MT I understand the need to help landowners struggling with game damage, but the shoulder seasons are a poor solution. The population "objectives" are laughably low in many areas. So, we're using bad "objectives" based on landowner "tolerance" to drive the implementation of a poor solution (shoulder seasons). A few issues I've seen with the shoulder seasons: 1. Some (not all) landowners are taking advantage of the system by charging trespass fees and guiding hunters to hunt cows during shoulder seasons. If these landowners could extend their business season by 4 months, I don't blame them for supporting shoulder seasons and saying there are too many elk. 2. Why are hunters allowed to hunt public land (BLM) during the shoulder season? I thought this was supposed to be a tool to prevent game damage for landowners. 3. The shoulder seasons aren't a targeted approach to solve the issue. The idea of this is "by reducing elk populations, we'll reduce game damage and complaints from landowners". This is an overly simplistic idea that doesn't target specific properties to help the landowners that are experiencing the damages. You're just releasing a bunch of hunters in vast areas to kill as many elk as possible. 4. Population objectives. Is this being used as the measuring stick for success? If so, it is a very poor technique. The goal should be reducing game damage for cooperative landowners, not targeting what population you think would accomplish that. I think there are more appropriate management tools to reduce game damage for landowners without giving anyone a chance to take advantage of the system for financial gain. The game damage roster hunts were a more targeted approach. Landowners having issues should be able to ask FWP for help, where they could provide hunters to take care

of the problem without fees. That is a much more specific and targeted approach to the problem. The goal should be to reduce game damage while maintaining healthy populations of elk available to the public. I also support raising license fees for residents to help FWP manage these issues.

155 Chad Bakich Bozeman MT By targeting the older mule bucks all your going do is eliminate any trophy class animals driving most people to stop hunting. The deer numbers were already way way low this past year in areas 502 and 510 and 520. You'll end up with a lot of angry hunters at best and may lose a majority of sportsmen. I know other states like Wisconsin and Minnesota have tried eradication it's not the answer folks. Try educating the people ie hunters on what to look for in these animals

156 Gerald Martin Trout Creek MT I am opposed to continuing the Elk Shoulder Seasons for 2019 and any following years. The current war on elk from August 15 thru Feb. 15 is only serving decimate the elk on lands open to public hunting both public and private and is exacerbating the problem of "harboring" on lands closed to public hunting. Elk learn quickly where sanctuary lies from hunting pressure and those that do not learn are killed. Most of the elk killed are those that spend a significant amount of time on public lands and are not the problem elk that cause predation to ranchers haystacks in the first place. It is way past time that FWP starts managing elk numbers for the health of the herd and according to the biological carrying capacity of the habitat instead of managing according to the dictates of so called social acceptance. Montana ranchers do not have a problem of too many elk. They have a problem of neighbors who legally and rightfully chose to restrict hunting on their properties which allows elk to increase in certain areas, spreading out on ranches that do not like elk and then retreating to sanctuary when hunting pressure is placed on them. This is a human social problem not an elk abundance problem and the elk and the public land hunters should not be the ones suffering because of this. Stop the elk shoulder seasons.

157 Kole Campbell Missoula MT Set quotas for the districts, rather than OTC

158 Dillon Johnson Helena MT I understand that this comment will likely never be read, but I feel I need to voice my opinion. The current shoulder season has to be one of the most ridiculous "management" practices that Montana FWP has ever enacted. If the elk are such a nuisance and overpopulated one would think that more land owners in these areas would be letting hunters in during the general season. I understand that elk do migrate from public lands to private lands to winter and can be very detrimental to ranching practices. But, when certain land owners are outfitting for bulls in the general season then want to knock down the number of cows in Jan and Feb is just a little absurd. I do not know of anyone that thinks that there is a necessity for a SIX MONTH elk season. If these ridiculous hunts are to continue it is, in my opinion that they should only take place on private land where the public is allowed to hunt both bulls and cows during the regular season. If access were granted throughout the season to the public the number of elk would likely drop proportionately to what you are observing when killing elk while they are chest deep in snow in winter ranges. With the way FWP has "managed" elk herds over the past 15 years it is very apparent that you are trying to kill off more elk until the populations are under the ideal quota. In doing so Montana will have more and more limited entry districts that will be big money makers for FWP. I'm really looking forward to when Montana is similar to other western states where general tags are a thing of the past and to hunt a bull requires 10 years of preference points and to hunt a cow requires a land owner tag and \$8,000.

159 Nathaniel T. Ward Kalispell MT I am opposed to any and all shoulder seasons. I believe that the elk management population objectives should take into account private lands which are inaccessible to hunters and harbor elk. My fear is that we are putting too much pressure on and shooting a good number of the elk which live on land accessible to the average hunter because of unreasonable population objectives. Montana hunters want opportunity, but it must be recognized that part of the "opportunity" hunters talk about is the opportunity to see animals and have success. I do not like the current plan of waging war on the elk from August 15-February 15. If elk are a problem for landowners, there are ways to alleviate these problems without deviating from the normal season structure, but we should not be letting them dictate how our hunting season is structured just because it suits them better.

160 Adam Sepulveda Bozeman MT I request that MTFWP does not maintain the current shoulder season structure. For several HDs, this is year 3 and no annual or multi-year summaries have been publicly disseminated. I am a federal wildlife biologist and we are required to provide annual reports to the state, which are

publicly accessible. Why can't FWP do the same for their constituents?

161 Trent Thomas Elliston MT Shoulder seasons should be scaled way back if not completely removed. Killing cow elk in mid August while their calves are barely 2 months old is disgusting, as is hunting pregnant cow elk in February in the middle of winter. It's very hypocritical that WMAs are closed until May 15th to provide security for wintering animals but then FWP allows people to actively hunt/pursue pregnant elk until Feb 15 which occurs through the harshest portion of winter.

162 Kurt lang Roundup MT Believe shoulder season should be after normal archery and rifle season to allow all hunters a chance to fill tags during normal season first. Also think law should be worded so outfitters can't charge for service during shoulder season all it's doing is allowing large ranches to profit from extended season when this season was enacted to control population where needed.

163 William Daly Butte MT Last year I had a special bull tag in the area 580-22. I believe that having the season open for cows, directly after archery season made it harder to find a bull elk, because cow hunters were hunting a week earlier than the special tag holders I don't believe it's fair to the special tag holders. I think you should open both bull and cow hunting the same time after archery season. My only complaint with shoulder season is the week between archery and rifle. I believe you would have a better Harvest if it opened on general opener.

164 Kevin Robinson Missoula MT No shoulder season on private or public land. Trap them and move them like bighorn sheep and relocate to under objective hd's. Pretty simple actually. Thanks

165 Craig Wagner Glendive MT I participated in the shoulder season in 2017 in the Missouri Breaks south of Malta. It was a joke from a hunting perspective. Too many hunters and the areas East of Timber Creek were basically cleared out of elk due to the high numbers of hunters. The elk we found West of Timber Creek were herded up and being pushed all over the place with many wounded animals. It appears that the shoulder seasons are catering to the private ranches that do not allow public hunting during the regular season. Unsuccessful hunters with special permits for bull elk should be able to use their special permits during shoulder seasons. I hunted the Missouri Breaks from 1985 to 2016 and overall the quality of hunting is poor due to the high number of hunters. It has went from world class to average at best. Shame on us!

166 Tom Widner Bozeman MT I suggest that any private landowner whose property is participating in the shoulder season hunts should have their name and contact info detailed on the FWP website. Restrictions to the days/times contact is accepted may be defined.

167 Mike Agee Helena MT It is my opinion that the shoulder season should be stopped immediately. I do not believe or trust MT FWP elk count numbers in the shoulder season districts. Particularly with the harsh winter of 2018. (high hunter success rate and some winter kill) I personally hunt some of these districts and I do not see the numbers of elk FWP claims. I also have an issue as to where the target population number comes from? Is it science that sets the target elk population? I understand that the number was set by legislature in the 60's when there were very few elk in MT. the target population number was just picked without any real science behind the desired population. (because any random number was a better than the current population) I feel like our desired elk population could be much larger than what it is today. I believe that there is more than adequate habitat to support more elk. Elk herds on private lands ultimately should be controlled by the land owners. I do not believe it is the States (FWP) job to do this. I strongly believe that elk should not be hunted (7 ?) months a year. Give the elk more stress free time. Ethically I think the current plan of hunting elk so many months out of the year is wrong. Final thought. The Shoulder season was intended to reduce elk numbers on private land and over target population areas? Again, private land owners should and must deal with this on their own. It really is a slap in the face to watch large land owners make considerable amounts of money hunting trophy bull elk during the regular season. Then in the shoulder season these land owners are able to "manage" their elk numbers by having public hunters come in and take cows. It appears that land owners like Ben Galt and his like are able to have their cake and eat it too! Final final thought. If elk are eating ranchers out of house and home then I completely agree that they should be managed. This should not be done with an all out season. Precise hunting of those elk that are problematic would likely be a far better way to manage elk behavior and population. Instead of a shoulder

season I think we should go back to killing elk off of hay stacks. This would reduce elk numbers and change elk behavior in a hurry. I do appreciate all the hard work FWP does. I wish I trusted your organization more!

168 Toby Hill Billings MT I am a proponent of keeping elk shoulder seasons. I am primarily an archery hunter and hunting elk with a bow is my favorite past-time. I know that some feel like early shoulder season disrupt their archery hunting. My wife and I have both harvested cow elk in the early shoulder season with rifles. Having an elk in the freezer takes pressure off of us during archery season. I haven't found that the early season has changed elk behavior for archery season too much. One thing that I would like to see more of is access to private land to hunt elk. We have had to travel to area 411 to kill most of our elk during the shoulder season because you can hunt on BLM and State Land in region 4 during the shoulder season. It is still very difficult to get access to private land in many of the areas in regions 4 or 5. Thanks for reading my comments.

169 Jesse Moldenhauer Townsend MT I strongly disagree with killing cow elk on August 15th. Their calves are only 2-3 months old. I don't believe that it is responsible management of elk numbers. I also don't agree with killing cow elk on Feb. 15. I have personally seen what the fetus out of a cow that was killed ~Feb 10 looks like. I think that Montana is being reckless with elk management to appease ranchers/landowners. A shoulder season that begins after the last day of the general rifle season through Jan. 1 needs to be sufficient.

170 Neil DeZort Kalispell MT I am against the shoulder season. This is not a biology based decision but a politically driven one. We need to give these elk a break. They are now hunted for 6 months. The cows are already 3 months along in pregnancy and trying to survive Montana's harsh winters and now we are pressuring them even more during this critical time. If landowners want less elk around they should allow more access during the general seasons rather than selling our public resource to the highest bidder.

171 Rodney Williams DEER LODGE MT The season is waaaaay too long. Bow hunters are getting shot at by the shoulder hunters. The cows are pregnant almost to term. It's NOT ethical hunting, it's a killing. This shoulder tag is disgusting, raping of hunter ethics, increases illegal activities and it's an extermination upon the elk, who have stress 6 months of the year from humans and a year long by predators. I think the Fish and Game need to go to Rehabilitation, for STUPIDITY and IGNORANTS, and sober up to reality.

172 Kris Keller Wolf Point MT I am against the late season cow elk hunt in the Missouri Breaks in districts 632, 631, 622, 621 and 620. All it has done is train the elk to go to private property where there is no or very little hunting. I've seen it get worse the last 3 years and it has really affected hunting districts 631 and 632. There is plenty of public land to hold and maintain large numbers of elk in the Missouri Breaks.

173 Joshua Keller Havre MT No to shoulder season, go back to damage hunts with private landowners willing to allow public hunting.

174 Chad Richland MT The shoulder hunts are not working. Private access continues to be the problem. Damage hunts with landowner access is the only chance we have. Until then let the elk eat their hay and grass. If they don't want to help they have to reason to complain. This is coming from a private landowner as well!

175 Jon Kolstad Glasgow MT No Shoulder Season. It might be fun to sell lots of extra tags, but a poor idea. The Pines resident herd is all but eliminated. Long time FWP hunters with Coveted Pines tags now venture towards Hinsdale 631 to find elk. Sad.

176 Robert Badder Ionia MI Getting the elk numbers down in proposed units is as simple as giving out more cow tags. I know several hunters that were unsuccessful in drawing a cow tag. Do not take bull hunting away. If you do that it will be a huge impact on revenue for the state of Montana. It will affect license sales, gas stations all the way to the waitress that sets eggs on the table. Thousands of dollars per year are spent by hunters. I have talked with several who say they will hunt elsewhere. If a new area is to be learned it will be in a different state where licenses are cheaper. Another way to take more cows is to open up public ground for the shoulder season as well. Don't just limit it to

private land.

177 Ty Stubblefield Florence MT Please stop the shoulder seasons. We need to find a different solution to the problem than hunting and killing elk 7 months of the year. We need to manage our wildlife herds by science not landowners and legislation. Thank you,

178 Eric ibey Arlee MT It is a good management tool and the need to open the federal land adjacent to the private land is essential to the target numbers. For three year now the group I hunt with could have tagged out during the hunts had that access been available.

179 Bret Lian Jefferson City MT I opposed all proposed Shoulder Seasons for 2019. It is unacceptable to continue to manage for objective numbers based on the desires of a social minority, and is harming the quality of public land hunting in Montana.

180 Brian Nordwick Clinton MT It has done nothing, but deplete the elk numbers on the public land I hunt. Where do you think all the elk from public lands winter? Most of them winter down low on private grounds, only chance they have to survive. We're almost never giving these animals a chance to rest, killing very pregnant elk is nothing less than a disgrace. These elk already put up with Non native wolves eating them 24/7. Plus these so called ranches are making a killing selling elk hunts and want to cry once the general season is over and now they're a problem. "The ranch by Jens exit, literally herds and keeps the elk on their ranch, by any means necessary, in general season. I've witnessed it. These big ranches are the problem." If you guys continue to manage our elk herds like this.... Western Montana will eventually become draw only, to kill a bull elk. You can honestly only depete a resource so much. I've hunted my entire life! Elk numbers on public ground go down each and every year and I'm a guy that puts on an incredible amount of foot miles. Please save our elk and the way I feed my family. Thanks for listening!

181 Taylor Ophus Butte MT Hello, as an avid hunter I really appreciate the opportunity to comment on this. My in-laws family ranch has fallen under the umbrella of the shoulder season in region 2 (Blackfoot Valley) for the past 3 years. In the first year it was a very effective tool for managing the herds/food as they would come down to the hay meadows to feed. As the hunt has continued (2017-2018) it seems to be much less effective of the actual taking of animals but still remains effective in the discouragement of having large 100+ animal herds in the hay fields. Seeing the overall effect of the shoulder season I would hope to discontinue it for 2-3 years and allow the stress on these animals to be mitigated and reassess the #s then. The nuance of this hunt is extreme and I understand the need to control some of these populations. The shortcomings however still lay in the private land holders hands. The same land managers that want less elk still do not allow the shoulders hunters (or any hunters) to access their land to truley allow the hunt to help with their issues. I think more outreach to these land owners would be pivotal to limit the stress on diminishing public land herds and the still expanding private land herds. Thank you for your time, Taylor Ophus

182 Taylor DeBruycker Floweree MT I believe that private land owners involved in this shoulder season should have to participate in a block management program during the regular hunting season, Bow and or rifle. The way the program is set up now it insentavises land owners to either lease out hunting rights or outfit their place during regular season and then have the public come in and manage the excess of cow elk that destroy grazing, crops and haystacks. If these landowners truly want elk heards managed by the public let it be done during regular season and include bulls in the management numbers. Shooting cows after they are bread to help out landowners that wouldn't give permission to anyone to hunt during regular season is wrong.

183 Samantha Big timber MT I think that the shoulder hurts has been a good idea. For me personally, it has gave us some relief in knowing we have more time. Also with the weather being the way it has the past few years it's been nice to have a later time in the year to go elk hunting.

184 Whitney Shanks Kalispell MT I believe that the shoulder seasons should continue. I have been involved in one in area 109. No success for my son or I as hunter's but successfully able to chase elk off alfalfa for a few days. It was a win for the landowner. As long as hunter's are responsible and respectful I believe landowners will continue to allow hunting. I did hear of a ranch in region 3, involved in block management that would not allow hunting

from the end of general season to whenever the shoulder season was over, unless you paid \$500. I think that is illegal but not sure. As a whole I think the shoulder seasons are a win for hunter and landowner both.

185 Rick Johnson Deer Lodge MT I think the shoulder season should continue but at a reduced time. Should only be available after the general season has ended.

186 John Kloote Bonner MT this season should be stopped. All I have seen are elk on private property down south and around the 200 areas that the public can't hunt. In areas where they can hunt private property the elk don't show up till dark and leave in the dark morning or are too far off road to hunt without horses if the property owner would allow it in the first place

187 todd a sasek ulm MT until you can included Forest Service lands in the shoulder season I don't see it accomplishing the long term objective numbers. Less landowners are giving hunting permission (many of them rightly so because of unethical hunters) and the weather usually determines when and if the elk come out of Forest Service lands. During hunting season many elk find refuge on private lands with little or no hunting access and during the shoulder season many elk find refuge on Forest Service land after being pressured on the few ranches that allow hunters. Get federal permission for certain Forest Service Lands then I believe the objective will be accomplished and the season would not need to be so long.

188 Do whats right for the public land hunter

189 Charles Taylor Whitefish MT The entire Elk Management Plan needs an overhaul. Terrible structure that is harming our PUBLIC elk. I am an RMEF Member - follow their guidance. I understand the illegal use of the federal dollars to supplement our much needed FWP law enforcement is out of your control though you must report how 1/3 of our enforcement has been tossed to the wind! Please! Up the Resident license fees by 20% to ensure our enforcement is able to DO THEIR JOB! Use the Pittman-Robertson fed \$ for the research, etc to create an EFFECTIVE Elm Management Plan. This current one is Harming Montana's prized big game! Thank you for reading my comment.

190 Derek Casanovas Bozeman MT I would agree with Montana FWP's position to maintain existing policies and approach to the Elk Shoulder Season for the 2019 season. My belief is a responsibly managed shoulder season contributes to a responsibly managed state wildlife program, and also is important to hunters and landowners who opt to participate in the program to offer a other opportunities for hunter success and mitigate wildlife impact to private lands, respectively.

191 Elizabeth Moore Belt MT We hunt for meat - not trophies. Part of the problem is that the elk are learning to hang out on the ranches where there is little pressure, or some landowners, like the owner of Sullivan Hill, are pulling out of the program. Most of the public access areas like the Highwoods and Little Belts are over-hunted now, and the places you can get to if you're not a mountain goat, have no animals because of it. There is little incentive for ranchers to allow public hunting when they can get great money from outfitters who charge a fortune to out of state hunters.

192 Idiots. Ya hunt elk 7 months out of the year.

193 Robin jacobson Roberts MT Cancel all elk seasons til elk move off private and back to public land. There is way too much pressure each year forcing elk to hide on private and it has been going on way too long. I'm done buying elk licenses in Montana til something changes as it is worth looking for a needle in a haystack any longer to me.

194 Tanner Johnson Belgrade MT Elk populations need to be based off of available public land and not elk that are stuck on private land or land locked. Continuing to drive elk onto private or unavailable lands for another three months puts stress on the animals until they find comfort on private in which they stay. Thanks for taking the time to read this. Your fellow hunter, Tanner Johnson

195 Vince Gray Bismarck ND My question is, why are you even asking for input on the shoulder season? When they were first implemented, the feedback was overwhelmingly against them and yet the

Department still enacted them. The management of Montana's wildlife is an absolute joke and is a huge shame. Custer National Forest is insanely overrun with hunters in the fall. That area used to be a phenomenal deer hunting location and now it is terrible. Back to the shoulder seasons, I think that they absolutely should be stopped. It is just turning into another way for landowners to make more money off hunters wanting to shoot an elk. Also, it's just incredibly dumb to manage a resource based off the landowner tolerance versus actual carrying capacity. If landowners want elk shot, I say get some helicopters and start shooting them from the air.

196 Nate Wilson Moscow ID Honestly, why even have seasons anymore? It is obvious that MT FWP has declared WAR on ungulate populations. It is not the 1960's anymore yet opportunity is actually being increased every year. I love hunting as much as anybody, but enough is enough. I am a former MT resident who moved to Idaho a few years back. I am so happy with that decision. I have accompanied friends on hunts in MT the last several years and the hunting quality has gone downhill tremendously. Elk and mule deer on public land in western MT are few and far between. My recommendations; Mule deer: -No B tags statewide! -Archery season: September -Rifle season: Oct 1st to Oct 20th. Wide open hunting of mule deer during the rut like we have currently is ridiculous. No other state does that. An October season provides plenty of opportunity if someone is willing to put effort in. Elk: -No B tags statewide -Archery season: Sept 7th to Sept 31st. There are a lot more people hunting with a bow than 20 years ago. I think this season needs reduced a bit. -Rifle season: Oct 21st to Nov 31st. Rifle elk season is a pretty low success rate operation, I don't think it really needs reduced. -Shoulder seasons: Get rid of them. Private land owners can let people access their lands during the general season if they want to reduce elk numbers. Quit pandering to the ranchers. Please start managing for carrying capacity/sound biology and not for politics. Nate Wilson (Former Montana resident, now in Idaho)

197 Austin Phillips Lewistown MT I am opposed to the shoulder seasons, particularly in HD 411. Allowing rifle hunters to hunt public land before archery season is a slap in the face to Montana Bowhunters. The elk are pressured onto private land where access is not allowed. Everyone knows the elk are not the problem, the lack of public access is.

198 Steven Blair White Sulphur Springs MT I believe this season should remain in effect as long as possible. The only change to the program would be to open forest service property to the program. Thank you.

199 Ian Wargo Kalispell MT I am opposed to the current elk shoulder seasons and feel that the entire elk management plan and shoulder season structure needs to be revisited. The issue is not too many elk it is an elk objective that is set too low. Unfortunately, farmers and ranchers seem to have more influence in this state than the hunters themselves do. If framers and ranchers feel that there are too many elk because they see them show up on their property in the winter months, then maybe we should look at how our public land is grazed. Many of the "winter ranges" in Montana are grazed by cattle, from the same rancher that is complaining about elk damaging their crops in the winter. Here's a thought, maybe the elk would never leave public ground if there was food left for them to eat in and it had not already been grazed... Elk shoulder season treat a symptom they do not provide a solution. All they do is decrease opportunity for hunters in the general season. I would be way happier to see my tag price go up and see a cost sharing opportunity to get some of these alfalfa fields that the elk are hitting fenced than decimate elk populations. The thing FWP must realize is that people will complain no matter what the elk numbers are. If we reduce our numbers to quarter of what we have, someone will still call and FWP will have to address it. Let's work towards a solution and stop putting a band aid on the symptom. Vibrant elk numbers should be celebrated not vilified. Thanks!

200 Matthew Hagel Great Falls MT Keep it going. Possibly look at shortening all seasons to Jan 1 or Jan 15. I think Feb 15 is too late when you shoot a pregnant cow. The calf is well developed and is hard to handle for most when they harvest a pregnant cow.

201 Vance McCall East Helena MT I think that FWP should continue the shoulder season to manage elk populations.

202 Dwayne C Garner Missoula MT I think that the shoulder season must end. A lot of elk on private land is being counted toward the elk management plan that should not be counted by your own rules that you put out on elk management. Your making elk in the state seem like they are cockroaches of the land and need to be

eliminated. A lot of elk you are killing are migratory elk that are not the problem. They need to be protected so they continue to migrate. If there is a problem with specific elk manage that animal not one on the other side of the unit. Any dead elk counts towards your goal is not the way elk should be managed. I think there needs to be a lot of changes to get our elk back on public lands where they belong. With the amount of forest fires we have had there is plenty of food on public ground now. I expect you to do a lot better job than you are when you look at our elk numbers are where the general season hunter hunts. This if it's brown it's down hunting needs to end.

203 Neil Jacobson Lakeside MT When Elk shoulder seasons were established the sportsmen were led to believe that elk that resided mostly on private land were no going to be counted in the objective numbers. If this directive were to be followed as we were led to believe there would be no shoulder season in a lot of these areas. Shoulder season are unethical. Shooting cows with 2 month old calves is wrong dead wrong and shooting cows with fully developed fetuses is also wrong. Shoulder seasons should be eliminated for ever. If there are too many elk in a EMU just transplant them to region one and the lions and wolves will eat them up pronto.

204 Chuck Raymond Livingston MT I enjoy the shoulder season hunt. Don't necessarily agree with opening the season on August 15th. Too much time for the elk to feel pressured. The late season is great though. It allows a hunter to focus on taking a trophy animal during the season. Then, if meat is still needed after the general season there is an option with the shoulder season.

205 Brody Chapman Brooklyn Center MN It is unfortunate that Montana continues to hurt their valuable elk population by hunting them for half a year straight.

206 Kyle Paulson Belt MT The MT shoulder season is a poor solution to meeting elk population objectives that are driven more by private land owner preference than true biological science. In both the WSS area and the Highwoods, elk numbers have risen on private land and slumped on public land. Private land agricultural practices in combination with prohibitive access have essentially pulled elk off public land. Moreover, exauhaustive hunting pressure on public land fueled by the surge in archery numbers have made elk scarce on public land by the time rifle season rolls around. Only allowing shoulder hunts on private land that permits public access (block management), using damage hunts with lottery style opportunity for hunters, and taking steps towards curtailing archery numbers such as limited entry archery units, will help solve the issue. Private land owners who deny access, use agricultural practices that pull elk to their property without adequate fencing and then cry that elk are causing them monetary problems should not be rewarded with an extra elk season that is essentially off limits to the thousands of folks who didn't fill their elk tag. Stop shoulder hunts. Do what's scientifically right for the elk and ethically right for the majority hunter and quit allowing a few private land owners who refuse public access to influence management decisions.

207 Paul Donohoe Nye MT My name is Paul Donohoe..My family & I ranch at Nye. I am writing in support of the shoulder season. Last year we killed 50 cow elk & this year so far 30. We have found that it is imperative that we go with the hunters hunting, if not we do not get any kill success. Every hunter is taken at no charge. Please continue with the shoulder season it is a tool that works for the landowner & the sportsmen...Thank you.

208 Marlon Clapham Stevensville MT I have personally polled 850 + hunters from across the state to gather their opinions on the shoulders seasons. Most all felt the season started to early and ended to late. Most favored the start with general season and ends mid January. There was a problem with land owners leasing out their properties to outfitters and charging local hunters a fee to harvest an elk. The hunts were to be held on privet lands only and now they have multiple hunts on public lands. Most of the hunters liked the season with changes these few changes. Lastly the hunts need to be kept out of archery only seasons and areas. Thank You Marlon Clapham MBA President

209 Tom Lipko Poplar MT Shoulder seasons should be abolished and return to post season damage hunts only as a way to control elk harvest outside the regular hunting season. Shoulder seasons are (1) too broad in scope and closely controlling harvest is improbable/impossible, (2) interfere with normal archery and gun seasons, especially putting rifle hunters in the field during archery, (3) elk management objectives as they relate to hunter's desires, who fund game management in Montana for the most part, are flawed to say the least. Hunters want more elk in the available habitat! Elk management methods 20 years ago worked sufficiently for the average hunter. We need to stop modifying

management practices to cater to corporate ranches and large landowners. If those landowners want elk managed on their property, they need to permit access to hunters to help during regular seasons.

210 Noel Keogh Nye MT My name is Noel Keogh.. I am a land owner in 520 HD. I am in favor of continuing the shoulder season until Feb 15 as FWP will do this year...It gives us a greater opportunity to harvest cow elk numbers when they are on our property being brought down by winter storms.This has been a very mild winter & we have had fewer elk on our property until recently. The flexibility for us to manage elk numbers when they are on our property is dependent upon the weather bringing them down...By January 1, There was 30 plus cow elk taken off last year due to extreme weather conditions..This year due to mild weather we have only harvested around 10 head to this date. Having the flexibility to extend the season to Feb 15 gives us a window of opportunity to manage the herd the best we can.. Because the potential of transmission of disease from elk to our livestock it is imperative to give the landowners flexibility to manage these elk herds on our properties!!! Thank you for your consideration. Noel Keogh Chairman of Keogh Inc.

211 Ken Scalzone Dillon MT I am not in favor of any shoulder seasons for many reasons. I will share only one, at the top of my list is giving elk a break. They are observed, scouted, hunted and unfortunately poached for a long enough time period already each year. Thanks.

212 Chuck Rein Big Timber MT My name is Chuck Rein. I live west of Melville, MT on the east side of the Crazy Mountains. I am a third generation rancher and a first generation big-game outfitter. I want to take this opportunity to share with you my thoughts on elk, elk management and access. My wife and I bought the ranch from my folks in 1976 and, as Dad would say, elk were "scarce as hens teeth." We liked it that way. We liked to see an occasional elk, but we were in the business of selling our grass via cattle, not elk. Over the years the elk numbers grew. Now of course, we are at the point where we have literally thousands of elk. Far more than were ever imagined by FWP or the landowners. Several factors had to come together for elk numbers to rise to such an extreme level. Mostly what I hear coming out of the Department of Fish, Wildlife and Parks is the landowners are to blame because they did not provide enough public access. Just last December John Vote stood before this commission and stated that FWP cannot manage what they cannot access. This kind of finger pointing is not helpful for solving a problem. The simple fact of the matter is all parties can be held accountable, including FWP. It is a fact that the late season cow hunts we had prior to 2006 were in fact bringing elk numbers down. When FWP decided to cease these hunts elk numbers increased at an unprecedented rate. Statewide elk numbers in 2007 were 123,571 head. By 2015 that number was 167,158. The late cow hunts worked and, by the way, were very popular to the hunting public. FWP chose not to continue these late season cow hunts. When I asked personal from the Region 5 office why, I was told the hunts were not working. The real reason is some wildlife managers wanted to smother ranchers like me with elk so we would be forced to swing our gates wide open to the public. Punitive actions didn't work then, and they will never work. FWP has to get past its idealistic ideology and face the fact that landowners, not FWP, control access to their private land. This is not to say that landowners will not cooperate with FWP for more public access. We will if we are incentivized. If we are to bring elk numbers down, we all need to get past the finger pointing of the past and work as partners. And it is a heavy lift that faces us. According to a March 12, 2018 report by my friend Justin Paugh, Big Timber Wildlife Biologist, we need to kill 900 head of elk per year just to hold our own. In 2016-17 we killed 487 elk. As you know, 2016 was the first year for shoulder seasons. Unfortunately the season in 2016 ended January 1. What the numbers would have been if the season were allowed to run until February 15 is not possible to predict. Suffice it to say it would have been higher. I will give you my opinion of what we ought to do to bring elk numbers more in line to where they should be. It is my personal opinion that the elk objective numbers should be revisited. I don't have the numbers, but I bet it has been at least 25 years since HD 580 was at objective or 975 elk. The following is what I recommend FWP does to bring elk numbers down. 1) Work with landowners to gain additional public access using incentive based methods. 2) Continue the shoulder seasons or reinstate the late season cow hunts. a. Remember it took us 25 years to get into this mess. It will take just as long to get out. b. Shoulder seasons or late cow hunts need to be open on public, as well as private, land. Elk understand where safe zones are. 3) We need party hunting. Yes you heard me right. As long as the tags are in the field, a hunter should be able to knock down as many elk as there are tags for. This is consistent with Montana Stockgrowers Association policy. 5) It will be extremely difficult to shoot our way out of this huge abundance of elk and reach objective. We need to use every tool available.

- 213 Larry Cawlfeld Helena MT Shoulder seasons are a farce. We decided a long time ago that there would be no more special late seasons for lots of good reasons. And that is all shoulder seasons amount to.
- 214 Brent Scoble Temperance MI Cow elk numbers appear to be down in the units I hunt. Please discontinue shoulder seasons
- 215 Ronald Garbarino Butte MT Please limit these so-called shoulder seasons! There is no "fair chase" involved here! Please look for other solutions for limiting elk population! For myself and many others a "fair chase hunt"-is one of many reasons to support elk habitat and everything that entails!
- 216 Dean Chapel Deer Lodge MT The shoulder hunts are an largely an unethical slaughtering of vulnerable populations of elk. These same elk would gladly be taken ethically and thankfully during the regular hunting seasons if allowed to do so. For a perfect example of unreasonable restrictions in an area that allows a shoulder hunt, look at the Dunkleberg BMA's (State ground) restrictions (only one vehicle may be at the parking lot at a time) along with the region's tag restrictions. Ending the shoulder hunt will open private ground to more hunting. We need to stop cropping cow elk to satisfy landowners, many of whom are operating de-facto or outright outfitting businesses on their land, all the while getting "agriculture" tax breaks.
- 217 Keith Atcheson Butte MT I'm writing to express my opposition to the continuation of the cow elk shoulder seasons. An extra month after the archery and general seasons, which are already quite liberal is acceptable but to allow the hunting of one our most treasured resources here in Montana for 6 months is overkill and immoral. Please stop this practice and give them a rest.
- 218 Steve Wisler Elliston MT I primarily hunt elk in HD 215 . In 3 years of hunting the shoulder season here's my thoughts /experiences . In '16 & '17 myself , my son , my daughter & her husband all had shoulder tags . He hunt Hank Kerttulas ranch outside Avon . In '16 it was too hot to hunt until mid Sept . , had alot of fun , saw elk but filled zero tags . '17 my son filled his in late Sept . In '18 I filled mine Aug. 28th on the one cold day . In '18 I was the only one to purchase a tag . Reasons : on "paper" the shoulder hunt looks like a "giveme " but in reality it's anything but . Aug. is typically too hot or the ranch is closed due to fire danger . After general season ends access is pretty much impossible plus the elk are no longer there . '18 the elk were pretty much gone after Aug . In '18 Hank decided to NOT let rifle hunters on until General season , only archery hunters . I got lucky as I was let on before Archery . I know the land owner can make such decisions but what's the point of early & late hunts if theres no access ? For me living where I hunt I could justify buying a shoulder tag , for the rest of the family they decided it was a waste of time & money so likely won't hunt shoulder again . Overall hunting access for shoulder in the Little Blackfoot area is very limited in spite of the perceived ranch opportunities . You've got to be willing & able to walk a long way & once winter sets in pretty much forget it . Add that '18 was unusually hard to find game everywhere , not just 215 , looking to 2019 it's unlikely we'll even bother with shoulder this year at all .
- 219 Zane A. Cozby Deer Lodge MT The shoulder hunt is truly a shame. Just make the general tag open for either sex in the area with shoulder tags. Give land owners a safe space, but work with them to give access to our elk that are herding on private property.
- 220 Mark Livesay Missoula MT I simply do not have a better way to pass along my comments and thoughts than by 100% agreeing with the article written by one of your Thomas Baumeister Measure of the hunt: Elk deserve better https://helenair.com/opinion/columnists/measure-of-the-hunt-elk-deserve-better/article_60165c01-1828-550c-8d9c-19be6c853d6e.html?utm_medium=social&utm_source=email&utm_campaign=user-share
- 221 Barbara Gregovich Butte MT I do not agree with ANY shoulder seasons, let alone extending them. The focus of hunting should be just that - hunting, not killing. Killing elk in August when calves are still nursing or in January and February, when herds are concentrated and trying to survive winter and when cow elk are pregnant is unethical.

222 Bruce M. Coccoli Choteau MT Please note my 'Nay' against any extension of any Mt elk shoulder season. It is time we rethink the 2nd and 3rd order affects of such legislation. Are you a hunter or meat gatherer? If the latter please go to your local grocery store. Thank you.

223 Bob Riley Dillon MT My comment was not finished before it was inadvertently sent. No I'm not in favor of extending the shoulder season. Not ethnical and not sporting.(no fare chase or effort needed.) Thank you for doing the survey.

224 Jim Crichrton Helena MT I am responding because of Tom Baumeister's excellent piece in the January 17 Independent Record. I am in full agreement with his excellent writing on the subject of elk killing. I find it annoying in the extreme that 5 governor appointees overrule the many scientists who are employed by MT FWP to manage our assets. It is my strongly held opinion that Labor Day to Thanksgiving weekend is a ,long and long enough season for elk hunting. I fully agree with the principles of private land ownership guaranteed under our constitution and laws, but the private trusts of wildlife and public land should be managed only through the consent of the public and not by the opinions of a five man appointed group that is subject to private and political pressures. Please work to have better public land habitat management and better public land game management.

225 Gail Delp HELENA MT I am not in favor of the early shoulder season during archery season. Had rifle hunters shooting around us during archery season this last year.

226 Jake Paetsch Missoula MT Since moving to the state I've found it personally challenging in my eyes to hunt when wintering and peak stress for these animals. I have never participated, but I guess I have trusted and "hope" that FWP is making accurate calculations on herds and conservations as tough as this practice may be. If this hunt is driven by legislative and not scientific, am I against this approach.

227 John T Conrad Stevensville MT Dear Fish and Game, I have been hunting the great state of MT for 22yrs and cherish all it has to offer. I understand ranchers frustrations with game, in particular elk, damaging fences and eating hay. The increased season length is quite excessive in my humble opinion and more thought needs to be put into the individual hunting districts. More regulation/rules need to be put in place at a minimum. I have personally seen the absolute worst in hunting when it comes to shouldering seasons. Due to the nature of these hunts, it mostly takes place on private land in non typical elk hunting country (fields/wintering grounds). People in general seem to flip a switch and all senses go out the window when they see elk. Road hunting, no hunter orange, hunting with high powered rifles WAY too close to homes/residential areas is taking place. I love hunting elk and I love elk. It truly saddens me to see a herd have to sit in a field and get shot at by Elmer Fudd. Managing elk/game herds responsibly is near and dear to me and I thank the Fish and Game for all they do. To sum this up I strongly feel some serious thought/reconsideration needs to be had before re-instating the same ole shouldering season rules. Thank you for your time. John Conrad

228 Ted Hawn Helena MT The proposed elk shoulder seasons should not be allowed to continue. It appears that the elk shoulder seasons have had limited success in some hunting districts-due mostly to landowners involved in outfitting/guiding and not allowing public access. As is well known, lack of access is the main problem. Also, basing the elk population quotas on available habitat instead of on landowner tolerance needs to be re- considered which would change the way elk populations are managed. Lastly, hunting elk for 5-6 months a year is just not a tenable solution.

229 Riley Pearson Maricopa AZ Hello, Until just this year, I was a Montana Resident my entire life and have hunted elk in Montana every year for the 16 years I've been old enough to. I intend to continue hunting elk in Montana as a Nonresident. The management of elk in central Montana has always been troubling to me. I understand that due to a 2003 bill FWP is required by law to take landowner tolerance into account, and not solely base objectives off of range capacity. With that in mind, I still think things have been taken a bit too far with the 6 month hunting of elk. In some of these units we could literally kill every 'available' elk and the unit would still be over objective by thousands of elk due to harbored unavailable elk on private lands that allow little or zero hunting. In the Elk Management Plan (EMP) it states that populations of elk and elk objectives should be determined by the numbers of elk that are available to the public for harvest atleast part of the year. To my knowledge, this is only happening in HD 270, and was only implemented after a serious push by local advocates. The EMP needs to be followed consistently across the board. Until

the legislature can get its head on straight and repeal the 2003 bill by Ms. Barrett, I suggest that FWP; -Follow its own EMP in only counting elk that are publically available. - In HDs like 411, 580 etc, make the highly sought after, rifle special permit bull tags valid for public lands only. - take a hard look at making general elk licenses and B Tags valid on private land only. - Shoulder hunts should be held on private land only. Pressuring the elk at current levels has demonstrably led them to seek refuge on private sanctuary, exacerbating the problem it is supposed to fix, while making less elk available to the average hunter. -Close all shoulder hunts earlier. Perhaps Dec 30. Hunting elk, especially during a bad winter, until Feb 15, is unethical, unsporting and puts serious strain on the entire herd in deep snow, extreme cold and during the development of calves. Thank you for your time reading this comment and for your consideration of the public's voice in the management process. Respectfully, Riley Pearson

230 Christopher Reuel Proper MISSOULA MT I would like to see shoulder seasons decreased in total length of the season or a reduction in the number of tags issued. I feel our elk seasons here in Montana are long enough. We have almost 3 months of elk hunting between Archery and Rifle season. I feel the elk deserve a break from the constant hunting pressure humans place on them and should be able to focus on recovering from the fall hunting season and the long winter ahead. I am a hunter and spend substantial time afield during our seasons here. Most of the hunters I know who hunt the shoulder seasons are lazy in comparison and don't bother putting in the effort during the regular season since they feel they can just wait and let the snow push the elk into an area they can more easily access and harvest an animal. I fail to see the ethical side of the hunting in this manner. Chris Proper

231 Gary Sonsteng Butte MT I am against any extended or shoulder season of cow elk beyond the regular season

232 John Vuicich Anaconda MT Let me just say I agree with every word written by Thomas Baumeister in the January 17th issue of The Montana Standard editorial page. I would further add that Montana's FW&P totally disgusts me for starting these elk shoulder hunts. You should be ashamed of yourselves for even considering such "hunts" as you call them. As Mr.Baumeister puts it-Montana's elk deserve better.

233 Robert Evans Clancy MT I am against the shoulder seasons. Their only purpose is to kill pregnant elk cows on private land to protect landowners hay grounds on property otherwise closed to public hunting.

234 William Schauman Helena MT I believe that the shoulder seasons have been ineffective and unfair. If you don't know anyone you don't have very good opportunities to be successful. I think this was a weak effort to reduce herd sizes, but skirting the real problem, ACCESS! I drew a 380 B North tag last year and the decision to allow all hunters to hunt that area for the first 4 weeks was ridiculous. The FWP sends me a letter telling me to hunt private land or close to private land, but then allows all rifle hunters to go in and try to shoot cows! What good did my B tag do? After the opening weekend there wasn't a cow on any of the BM properties! They had been pushed to private land. Then the daily pressure kept them there. If FWP is going to award, by drawing, these tags the hunters who drew them should have at least a fair opportunity to harvest a cow. There again, the problem is ACCESS! I would like FWP to spend more money and time for quality access instead of shoulder seasons and allowing hunters without the special tag to hunt the same few properties that allow access. I was fortunate to harvest a spike with my bow or otherwise it would have been a disappointing season hunting in HD 380. I believe hunters are very good at killing elk if they have access to them. Please work on that and you wouldn't have as many over population problems!

235 Ronald P Lashley BOZEMAN MT The shoulder season is in my opinion a disgrace. We are letting landowner tolerance dictate what is good for the resource rather than science. Ranches that do not allow any general season access due to being outfitted are now able to manage their populations at the expense of the state and the hunters. This is taking place while they are receiving reimbursement for damage caused by the elk. No other business is so heavily subsidized and catered to. Game damage is a cost of doing business we shouldn't be facilitating the outfitting and then providing help on the backend. This is a system that landowners are abusing. Our resource deserves better.

236 diane larkey helena MT They should get rid of the shoulder season!!!!

237 Scott Nuthak Butte MT Shoulder seasons should not run into January and February, as the elk need a break during our harsh winters; and pregnant cows will be stressed at such a critical time. If landowners don't want elk on their land, they should allow hunting during the general season. Those that don't should not be eligible for depredation hunts or shoulder hunts. We don't have too many elk, we just have too many elk on private lands because these landowners want to get rich off a public resource - bull elk, and not allow public hunting unless it's after the season and for cows only. We put up with rancher's fences and gates, cattle destroying wetlands, overgrazing by cattle, and being locked out of checkerboard public lands; yet they pay nearly nothing for public grazing rights and lock us out of their lands, unless it's for cows only. I'm not in favor of hunting into January and February because it's just too hard on the elk, especially pregnant cows. If landowners would allow hunting during the general season, we wouldn't be in this mess. These landowners take everything, and give nothing. Shoulder seasons should only be on private lands where hunting is allowed during the general season.

238 Mike Bleile Anaconda MT Shoulder seasons should be eliminated as hunting them outside of traditional hunting season turns into killing and not hunting. We need to manage Elk with science based methods and not by the lawmakers in Helena. Elk populations are fluid and the risk of overharvesting is real. I am in favor of local management during traditional hunting seasons with increased cow B tags or permits in areas science has determined as overpopulated. What is the Bull to Cow ratio in these shoulder hunts as when pregnant cows are harvested it may lower the number of bulls in the future. Please stop these hunts and return to responsible hunting seasons. Thank you, Mike.

239 Brendan Osborne Spokane WA Obviously Montana's elk numbers are far over objective, causing headaches for both landowners and the state. Though having extended hunting seasons to pressure the elk may seem like a good way to reduce heard numbers, I am doubtful of the efficacy of the policy and have welfare concerns. For hunters, it's not merely enough to have an open season and a rifle in hand: they need land access as well. When elk are primarily on private land, this can present a problem as hunters are unable to gain access- hunting is not allowed, regardless of the situation- or find it difficult to obtain access, due to unknown ownership or management contact information. These are both scenarios I have faced in Montana and other states and provinces. If this hunt is to be successful, it needs to understand this and be reoriented to be more like the depredation hunts, where hunters are matched with landowners, ensuring that landowners have their problem dealt with. Landowners that refuse to grant access should be held liable for damage caused to other landowners and the state due to excess elk numbers. We need to remember as well that currently elk are being hunted from August to February now in some units, without substantially hitting numbers. It's obvious we are pressuring elk and, given the low success of the shoulder season hunts, we should avail this opportunity to reduce the pressure on this species if we don't change the format of the hunt.

240 lee powers boulder MT I think that there should be no shoulder seasons to help landowners that do not let general hunting or access to public ground. in the areas that I hunt the fish and game run there count off of elk that are not hunt able by the general public so they cater to some land owners and all I see happing is that the elk that live on the public ground are getting wiped out. and the private elk are still driving the quota up. we did the same thing to the whitetail deer in area 320 in the 1990's you think we would learn from that mistake but it does not look like we did.

241 rex campbell silver star MT I am opposed to the shoulder season concept and it is getting out of control. This is not hunting, but rather just killing. The shoulder seasons are set when the elk are very vulnerable, again not hunting, but purely killing.

242 scott doherty Helena MT The idea to kill elk six months of the year does not seem like it is conservation minded. As of today, elk are trying to survive the winter, yet are unethically chased, shot at and killed throughout the winter. Public land is overgrazed, forcing elk to move to lower private ground. It seems like elk only have two choices, stay on public ground and starve, or move to where there is food and risk getting shot. This seems like a horrendous wildlife management plan that will decimate elk populations over time. Once again, it seems like MT FWP is managing wildlife by politics instead of conservation. These shoulder seasons need to end now.

243 James Helsley Townsend MT It is a tough game, get numbers down, but access is not easy. My personal opionion is that elk should not be hunted past December 31. I hunted the shoulder season around townsend this year, even with mild temperatures I choose NOT to hunt past december 26. At some point we have to decide if we

want to hunt or just kill. Elk hunting starts in August, goes until February (some places), then the horn hunters start harassing them in march until may. So they june and july to not be disturbed by people. The hardest time on an elk is probably january to april...and now they get chased for most of that time. Reduction in numbers might be achieved in part due to cows sloughing calves and starvation...not the ideal way to reduce populations. Like i said, it is a tough thing to manage, but i believe the shoulder season should start mid to late september and go NO longer than december 31. James Helsley

244 Dan Ritchey Malta MT I am a fan of the shoulder season. I have been able to harvest elk two of the three seasons I have had the permit. Keep it going in my opinion.

245 Ricky Clinton MT These shoulder hunts are ridiculous. If you want to trim the herd give out more general cow tags instead of chasing and hunting these animals for six months. Put it in control of the hunters not landowners. You can have all the shoulder tags in the world, but if you don't have access what the hell good is it? Typical government run shit show

246 John Ansley Bozeman MT Elk shoulder season should not go past December 31st. Elk are pressured from mid August until mid February with the hunting seasons and then are stressed from March through May with people looking for shed antlers. This is nine months of stress on these animals. Hunting season should only need to be from September through December. 4 months is plenty of season. Cow elk should not be hunted in January and February when they are pregnant and stressed because of snow/winter. This additional hunting pressure can increase mortality and abortion. We should focus on access to public lands that are landlocked by private lands. Access to these lands would increase access to more elk which would increase harvest rates. We should legally be able to access these lands, if we cannot, they are not public lands because the public can't utilize them. Only private landowners that border them can use them. This is not right! Thank you, John Ansley

247 Brian Scott Glen MT I remain extremely opposed to these seasons. I understand the need for population reduction but the landowners need to allow access during the regular season. I am a hardcore elk hunter but I feel this is inhumane and a public relations disaster for FWP.

248 Eric Butte MT Montana Fish and Wildlife Commission, Proper management of Montana's wildlife should be centered on scientific carrying capacity data rather than landowner tolerance. Managing wildlife based on landowner tolerance contradicts the North American conservation model that is followed by many Montana hunters after they learn about it in Montana hunter education courses. Montana hunting regulations should be designed based on principles of the North American conservation model including using science to guide decision making rather than the current use of land owner tolerance.

249 Conner Torstenbo Bozeman MT No doubt we need elk numbers in Montana to be managed by a scientific basis rather than landowner preference. Taking a disturbed landowners word for how many elk they believe are inhabiting MT is not legitimate.

250 Jeremy Harwood Helena MT Although the shoulder seasons provide additional opportunities for persons to provide food for their families, I disagree with the legislative mandate as a result of landowner dissatisfaction. I believe wildlife should be managed based on science and appropriate authority given to management to adequately perform their job.

251 John McDunn Helena MT I believe that the Option three should be selected. I would like to offer another suggestion that In districts where a land owner does not allow hunting and those elk reside on the land owners property year around, that those elk not be counted in objective. Along with that that those land owners should not be able to have a damage season in the next 3 years. My reasoning is that I have seen a land owner open for a very limited public hunting-allowing only a few friends(most being very local) on the property with the understanding that they can only shoot cows. They then get a damage hunt. I have witnessed this happening in the Madison Valley and the Snowy Mtns. It happens like this - It is kept private that they are going to allow public hunting they tell a few locals and they get on their list of public hunters then when the season starts they tell you that all the days are filled up. Just an observation: This happens in on BMA's all the time-I have called on the very first day at the time required on their BMA

sheet and have them tell me that they are already book up. now how is that possible when I there call time was 7:00 and I talked to them at 7:01.

252 Kaine Zetterberg Missoula MT Shoulder seasons should not be utilized for management of elk and deer populations in MT. Population objectives driving the current harvest goals are archaic. We need to have renewed population objectives with greater influence from the hunters and biologists and less from land owners allowing all shareholders to influence population objectives.

253 Larry Copenhaver Helena, MT Thank you for the opportunity to comment. I have not participated in elk season shoulder seasons although there are numerous opportunities within an hour's drive. The idea of "killing" elk calves, spotted and un-weaned in August and in the womb in mid-February is anathema to fair-chase "hunting"... the concept has moved away from fair-chase hunting and diminished to simply killing. In Montana's wildlife management history is huge efforts to provide a vibrant landscape populated by our highly revered large ungulates. Game ranges abound across the state and more are in the planning stage, dedicated to enhance our state's dedication to a healthy landscape and elk habitat. The shoulder seasons is a black-eye for hunters in general, and incidently a black-eye for MT landowners reluctant to allow public hunting especially during regular hunting seasons. It is highly doubtful that hunters regard our situation as having "an excess of elk" and more likely as a bounty. Killing cow and calf elk by hunting is the correct solution but executing it 6 months of the year smears our whole hunting society. A substitute management tool would be too only allow cow elk harvest and a very limited bull harvest, if any. Harvesting bulls does nothing to control herd sizes. Our elk Plan is 15-16 years old and a new plan that more accurately reflects the situation on the ground should replace antiquated objectives. HB 42 needs to be overturned to eliminate the "manage to sustainable herd sizes or under. Rethink the shoulder seasons to more reflect ethical fair-chase hunting instead elk killing and stressing elk when they should be resting and surviving Montana's hardest season; we provided options for wildlife management areas to accommodate wintering elk and are currently shooting elk on State school Trust lands where they should be considered in refuge. Please reconsider this heavy-handed season options. At the very least lose the early component while calves are nursing - SERIOUSLY, IS THIS WHAT YOU WANT AS YOUR LEGACY? I will conclude with that thought, Thanks you for the opportunity to comment. Respectfully, Larry Copenhaver

EMAIL COMMENTS/LETTERS:

1. **From:** Tracy Weyer [<mailto:tracyhuntmt@outlook.com>]

Sent: Thursday, December 6, 2018 3:16 PM

To: FWP General <fwpgen@mt.gov>

Subject: 540 Unit Proposals for elk

Hello

Closing the season to any bulls larger than spikes, will not open more gates or places for public hunters to hunt or help in access to reduce cow numbers but will close such gates and opportunities further.

TRACY

2. **From:** Joette Weyer [<mailto:jomarie2011@gmail.com>]

Sent: Thursday, December 6, 2018 3:36 PM

To: FWP General <fwpgen@mt.gov>

Subject: Unit 540 Proposal

Please consider that this proposal may cause more damage then good.

Joette

3. **From:** Greg Schraner [<mailto:greg.schraner.mtl@gmail.com>]

Sent: Monday, November 26, 2018 9:24 PM

To: FWP General <fwpgen@mt.gov>

Subject: Shoulder hunts

This is a bad idea, all that's happening is landowners get their way . If they are serious let us hunt on their land during the regular season you're pandering to them they get the cake and get to eat it as well. How much extra overtime does fwp have to pay for? They don't own the wildlife but act like they do. Stop giving in to them , I understand their problems but it's partly their fault let the public in during the regular season. Elk and deer get harassed enough in 5 weeks stop the madness

4. **From:** Adventures West [<mailto:huntwithkeith@charter.net>]

Sent: Thursday, December 6, 2018 4:30 PM

To: FWP General <fwpgen@mt.gov>

Subject: Performance Based Shoulder Seasons

I read your proposal for the Should Seasons and find it a bit unfair to landowners that currently have an elk hunting operation. They lose a substantial amount of income as they no longer can harvest branch antlered elk from their own land or additional leased land belonging to other private land holders.

Why not have an EARLY public lands cow season before the general season starts. Run it a month or two before rifle season, which gives the elk time to settle down before the general seasons open.

Also what about giving free of charge LATE SEASON (Dec.-March) transferable "landowner vouchers" to landowners. Landowners or their agents/outfitters can then allow some type hunting program that accomplishes the goal of the FWP to reduce elk numbers and also allows landowners to manage access to their property without opening the gates to everyone and their brothers.

Keith Hartman
P.O. Box 2675
Paso Robles, CA 93447
805-674-1623

5. From: Robert Badder [<mailto:blahrshowpigs@yahoo.com>]
Sent: Thursday, December 6, 2018 7:12 PM
To: FWP General <fwpgen@mt.gov>
Subject: 540 unit elk proposals

I have hunted the 540 unit for elk the last few years. This year I put in for a b tag and didn't draw. I know of others that put in for one as well. If the population of cows is higher than the desired amount then there should have been more b tags available. I am a nonresident hunter and could have harvested a cow the second day I hunted had I had that b tag but also wanted an opportunity at a bull. As a nonresident I spend around \$6,000.00 to hunt in Montana and would be great to have the opportunity to harvest a cow and a bull. I can guarantee that by only being able to hunt cows that I will no longer be spending that money there and I can assure you that there are a lot of sportsman that feel the same way. There would be a devastating impact on the revenue for the great state of Montana.

Thank you for your time. If you have any questions for me feel free to email me back.

Thank you
Robert

6. From: Robert Badder [<mailto:blahrshowpigs@yahoo.com>]
Sent: Friday, December 7, 2018 9:37 AM
To: FWP General <fwpgen@mt.gov>
Subject: Elk changes

Hello again, I emailed yesterday about the proposed changes. I just wanted to add that I feel if there is a need to harvest more elk then more cow tags should be available and the shoulder season should be open to the entire unit not just private land.

Thanks again for your time.
Robert

7. **Sent:** Friday, December 7, 2018 10:34 AM
To: FWP General <fwpgen@mt.gov>
Subject: Revised 2019 elk hunting proposal

To whom it may concern:

I am writing to voice my opinions as a life long Montanan, hunter, conservationist, and outfitter. I am concerned about the proposed revisions you have made to the 2019 elk hunting regulations which address closing portions of the general season to antlered elk. I believe this will negatively affect the overall goal of reducing elk numbers and also work to destroy the relationship between hunters, FWP, and landowners. Regulating a private individual by taking away opportunity for potential income will backfire. I believe the restrictions will anger landowners so much that they will completely close off their land to the public for both regular and shoulder seasons just to spite the FWP's change in regulations.

As an alternative extending shoulder season dates to Feb. 15th as well as making B tags available over the counter will be a much more effective way to manage numbers. Many people, myself included, enjoy the opportunities that exist to extend their time in the field with the shoulder seasons. This will also give the FWP the opportunity to work with landowners rather than against them to achieve our goals.

Thanks.

Jake Ingram

406-945-2349

8. **From:** Claudia and Andy Celander [<mailto:trimt@itstriangle.com>]
Sent: Monday, December 10, 2018 9:47 AM
To: FWP General <fwpgen@mt.gov>
Subject: proposed changes to current hunting seasons

FWP Commission,
We strongly oppose the FWP new proposals regarding archery and rifle season.
We believe they would further the divide between sportsman and landowners.
They would not help the FWP reach any of their goals in maintaining the proper population of elk herds.
We believe in additional over the counter b tags would be a good place to start.
We also believe that opening federal lands for the shoulder seasons would also be helpful.
Andy Celander
Claudia Celander

9. From: Chris Colson <cecolson@icloud.com>
Date: December 3, 2018 at 1:41:35 PM MST
To: fwcomm@mt.gov
Subject: Proposed Elk regulation change in HD540

Commissioners,

My name is Chris Colson and I am a landowner in HD 540. I learned from a friend that you may be considering a change in the elk hunting regulations to allow hunters to only harvest cow elk. For a number of reasons I believe that would be a mistake.

First, I agree that a general reduction in elk numbers in HD540 is a reasonable goal. That is why I was glad to see that the regulations were changed to disallow the harvest of spike elk in the unit this year via a brow tine or better rule. I think this is a step in the right direction to increase the cow harvest in the district. One is forced to wonder why this change wouldn't be given a few years at least to work before we change the rules again?

Also, as a landowner, I lease some of my property to outfitters. Hunters book hunts with outfitters largely for the possibility of getting an opportunity to harvest a bull elk. If you take this possibility away it stands to reason that fewer hunters will book with an outfitter and the result will be that outfitters will lose business. I gather there is not much sympathy for outfitters here in Montana, so let me explain why this is a bad outcome. I and many others lease our land to outfitters not just for money, but because outfitters are accountable, and because we can have specificity of what can be hunted, where, and how. Many of us, myself included, will not merely fill the gap with random hunters whom we do not know and trust. The result will be fewer cow elk harvested on our land. Take this year as an example. I allowed an outfitter to hunt two sections of my place the last 3 weeks of rifle season. 1 bull and 3 cows were harvested. The truth is that while hunters book a hunt for the possibility of killing a bull, when that opportunity does not present itself most

hunters will gladly harvest a cow. Regulations that allow for the harvest of only a brow tine or better bull will result in good cow harvests while still allowing landowners and outfitters to offer viable hunts. Reducing the presence of outfitters will not open any of my land to the public, but allowing them to stay will help achieve the goal of a reduced elk population.

I said that I leased some of my land to outfitters some of the time. I also actively hunt on the land with my father, daughter, wife, and usually seven or eight friends during the course of a season. My family and our friends have all shot small bulls in the past and therefore usually pass any bull less than a six point in favor of shooting a cow, because a chance at the “big one” only happens for maybe one or none of us per season. We gladly eat elk meat all year, and have many other friends that we also feed with our game. However, that chance of seeing the “big one” is the exciting possibility that keeps hunters like my dad and many others in the field. If we hunt less, we also harm the hunting on the public land adjacent to our property by not stirring up the elk herd. We farm, graze cattle, etc. on much of our land, but also value the quality elk hunting that our places provide. To continue to ensure the quality of the elk hunting we believe we have maxed out the number of people that can hunt our land between us and our outfitter friends and clients. For this reason we will not allow any additional public hunting on our land regardless of the regulations. So, if increased access to private land is the goal, restricting the rule to cow only will not help.

One solution I think you should consider rather than banning all general tag harvest of bulls is to further restrict the harvest of bulls to a five or six point minimum, while allowing an unlimited general cow harvest. I believe the evidence shows this to be a proven method of ensuring quality hunting while reducing the overall elk population. You might also consider granting every elk hunter, both resident and non-resident, who purchases a tag in this area a cow “B” tag to use to harvest a cow in HD 540. Having a specific cow only tag may encourage hunters to harvest a cow, while still enabling them to remain out in the field during hunting season pursuing that elusive bull.

I appreciate you reading and considering my comment.

Best Regards,

Chris Colson

P.O. Box 185
Ryegate, MT 59074
406-568-2446

10. **From:** Cayuse Hills Outfitters [<mailto:cayusehillsoutfitters@gmail.com>]
Sent: Wednesday, December 5, 2018 3:33 PM
To: FWP General <fwpgen@mt.gov>
Subject: Comment on 2019 Elk Hunting Reg change in Crazy Mountain area

I am a landowner and an outfitter near the areas talked about in this proposal and I cannot support the proposal as written. The only outcome I can foresee is a growing animosity toward the FWP from landowners in that area. I am well aware that the FWP has been trying to effectively reach their management goals and work with landowners, but by reducing opportunity for hunting bull elk in the area I believe the FWP will be running the danger of getting a reverse effect. By taking away bull tags and trying to force your hand on landowners, the FWP will be building a bad relationship. This proposal will also hurt area outfitters who will not recoup losses from those bull elk hunters that would have come during the last part of the season. These losses will most likely not be made up in cow hunters. Those that were looking to bull elk hunt will just find another place to hunt rather than put in for a cow tag.

In a time of looking for hunting access in that Crazy Mountain area, I would hope this is not the fight it looks like you are trying to pick. If landowners decide to restrict access even more, we could see even lower cow harvest in that area.

What I would like to see happen, is for the FWP and area landowners to come to an agreement of how to manage those resident elk in a way that will satisfy both parties. Maybe it is time we look to other states and their management practices to come up with something that works here for us. Guaranteed land owner tags could be an idea.

Another thought to end this comment, I couldn't easily find bull to cow ratio numbers on your FWP website? I'm sure a majority of people involved in this would be interested in those numbers. I suspect the bull to cow ratio is particularly high in those areas therefore I cannot make sense of lowering the number of bulls tags.

--

Wes Sargent

Cayuse Hills Outfitters

Ph:(406)537-4490 Cell:(406)930-0918

www.cayusehillsoutfitters.com

11. **From:** Mike Howe [<mailto:Mike@howesfishing.com>]

Sent: Friday, December 7, 2018 5:33 PM

To: FWP General <fwpgen@mt.gov>

Subject: 2019 Elk Hunting Regulations in Hunting Districts with Performance Based Shoulder Seasons.

I am writing today to express my concerns over the proposals being discussed.

- **I specifically oppose antlerless only restrictions during the general seasons**
- **I support a comprehensive review of elk management objectives, they are out-of-date.**
- **I support increased antlerless elk bag limit**
- **I support extending the Shoulder season to Feb 15**
- **I support over the counter B tags in districts over objectives**

Thank you for the opportunity to comment,

Mike Howe

Kalispell, MT

12. **From:** Craig Hueter [<mailto:trophieswest@gmail.com>]

Sent: Friday, December 7, 2018 8:54 AM

To: FWP General <fwpgen@mt.gov>

Subject: Elk proposals

In regards to the elk proposal being suggested, I agree that B tags should be over the counter which would increase the number of hunters wanting to harvest a cow. However, why would you limit someone to a 2 week season who has spent years acquiring points to draw a bull tag? This makes no sense and won't increase the cow harvest. It sounds like another attempt to force landowners to open up their property to hunters. This has never worked and never will. If you want more cows harvested then extend the shoulder season and make the B tags over the counter.

Craig Hueter

635 Stonegate Dr.

Bozeman, Mt. 59715

406.599.2585

13. **From:** Mike Rhynard [<mailto:mikerhy66@gmail.com>]

Sent: Saturday, December 8, 2018 2:05 PM

To: FWP Commission <FWComm@mt.gov>

Subject: Shoulder Seasons & Cow-Only Regular-Season Segments

To: Dan Vermillion, Richard Stuker, Tim Aldrich, Logan Brower, Shane Colton

Shoulder Seasons

I'm Mike Rhynard, owner of the Rhynard Ranch in the Castle Mountains. I'd like to share a couple thoughts with the FWP Commission on the elk shoulder season. We've run a do-it-yourself (DIY) hunting business on the ranch for the last 18 years, and have observed elk behavior much longer than that.

Elk behavior in our area changed with the advent of the wolf, but it changed dramatically more with implementation of the shoulder seasons. I believe the change is detrimental to both FWP's goal of reducing selected elk populations and to the strength of Montana's hunting economy; which includes outfitted and DIY hunting operations, restaurants, food stores, gas stations, hotels, meat processors, FWP's coffers, and more.

Over the years, normal elk behavior during the hunting season (archery & rifle) on our ranch has been mixed groups of 6-12 elk scattered all over the ranch and adjacent USFS ground; and our hunters saw elk nearly every day. But the shoulder seasons resulted in elk being hunted seven months, rather than the normal three months, of the year—more than double the norm—which predictably stimulated defensive behavior. Since implementation of the shoulder seasons, elk have bugled less, been bunched in large herds (100-200 or more) the entire season, spent much more time in the timber, and relocated (big distances) almost constantly. Bottom line for hunters: If you run into the herd on the move, you might shoot an elk; and if you don't run into the herd, you don't even see an elk.

Our regular-season harvest and sightings have decreased noticeably in the last two years, with most of the hit in the number of bulls, but also significant in cows. The reduced regular-season harvest, therefore, diminished whatever success the shoulder seasons generated in our area, which is counterproductive to FWP's goals and our business. Reduced regular-season success and fewer bulls will also, in a short time, hurt the Montana hunting economy. This is because most hunters, including Montana residents, think it's cooler to shoot a bull than a cow, and non-residents, at least, want a good chance to harvest *something* for the price of their tag. If they perceive they have a diminished chance to do so in Montana, they'll go elsewhere.

An approach that might prove more successful than hunting elk nearly 60% of the year, would be a return to only the normal season; but, in FWP's overpopulated areas, add an automatic B tag, for an irresistible price. It's a fact that almost every hunter will pass on a cow early in the week, with the hope of getting a shot at a bull later in the week or season. We always urge our hunters to draw for a B tag, but I estimate less than 5% of them actually do, because they forget to apply, or are convinced they'll get a bull. If the B tag was automatic and reasonably priced (1-stop shop), I'd wager almost every hunter would buy one, and a far greater number of hunters would harvest a cow in the regular season. I'd also bet such an approach would eliminate the now-prevalent defensive elk behavior, increase the cow harvest above what the shoulder seasons provide, and preserve Montana as the go-to place in the world for elk hunting. Recommendations: Quit the shoulder seasons before regular season hunters quit Montana, and give the above proposal objective consideration.

Cow-Only Regular Season Segments

As noted above, most hunters, including Montana residents, think it's cooler to shoot a bull than a cow. Thus, reducing the number of regular-season weeks during which a bull elk can be harvested will certainly and

greatly reduce the number of hunters in areas where such a policy has been implemented, with predictable results on the overall harvest. Such an approach will not increase the cow harvest, will reduce the number of non-resident hunters applying for tags, and has the clear appearance of an attempt to squeeze landowners into allowing more public access. See above for a different approach that will return us to a normal regular-season harvest, a larger overall cow harvest, and sustained Montana hunting-economy health.

Sincerely,
Mike Rhynard
mikerhy66@gmail.com
406-572-3357

14. **From:** Sue Rich Schneider [<mailto:werlivingdream@gmail.com>]
Sent: Tuesday, December 4, 2018 3:59 PM
To: FWP General <fwpgen@mt.gov>
Subject: Elk Changes

Folks, The actions you are trying to push through will not help reduce the number of cow elk harvested.....in fact it will work in reverse. By limiting the hunters to only pursuing cow elk will actually push most hunters to look elsewhere for their hunting opportunities. In HD 540 there are a lot of cow elk, if you really want to reduce the cow elk population just give every big game hunter in that HD a cow elk tag.....do not charge them for it. While they are chasing deer, antelope or bull elk they will most likely cross paths with a cow elk and with a tag in their pocket will be able to help in reducing the cow population. Rest assured that forcing landowners to allow cow elk hunters on their land will not work, they will shut the gates for anyone wanting access and the cow elk population will continue to rise. Give the cow tags away!!!

Sue Schneider

15. **From:** Richard Schneider <jjguideservice@gmail.com>
Sent: Saturday, December 1, 2018 8:47 AM
To: FWP Wildlife <fwpwld@mt.gov>
Subject: ** Email from fwp.mt.gov **

Name: Richard Schneider
Phone Number: 7158200869
Email: jjguideservice@gmail.com

To whom this may concern, In regards to the discussion and proposal of limiting elk hunting in HD 540 to only cows in the future has me very concerned. I am an outfitter who makes his living guiding elk hunters in HD 540. By taking bull elk hunting out of the plan you will basically shut my business down as that is our main source of income. In addition, By not offering a bull elk hunt in that HD you will actually reduce the total hunter density as most hunters are looking for a bull with a cow elk as a secondary target.

Most clients I book are interested in taking a cow elk as part of the hunt package, they want to chase bull elk and will harvest a cow if that opportunity arises.....if you take the bull elk out of the picture they will hunt elsewhere. If you are trying to up the cow elk harvest simply give the cow permit to any hunter who purchases an elk license, deer license or even antelope license. While they are hunting these different species they will run into cow elk and hopefully decide to take some additional meat home with them. This thought process will not help the harvest of more cow elk, it will work in reverse as hunters go elsewhere to find bull elk to target with the option of harvesting a cow.

Thanks, Richard A. Schneider
J&J Guide Service
715-820-0869

16. **From:** Rick Wilund [<mailto:rwilund@gmail.com>]

Sent: Sunday, December 9, 2018 11:04 AM

To: FWP Commission <FWComm@mt.gov>

Subject: Proposed Elk Regulation Change in HD540
Commissioner,

My name is Eric Wilund, avid hunter, co-owner and guide for J&J Guide Service. We are a MT based outfitter and we book a lot of elk hunts in HD540, among other units, each year. This message is in regards to the proposal to change the regulations to allow "cow elk only" to be harvested in HD540.

Here are my thoughts on this proposal:

I believe that allowing only cow elk to be harvested would be a big mistake and greatly reduce the number of elk hunters that travel to this area of MT to hunt elk. The lure of harvesting a bull elk is a very real reason that many hunters pursue elk and to eliminate that possibility would cause many hunters to go elsewhere. As an outfitter, we have many hunters come to us with the hopes of harvesting a bull elk but are actually very happy to take a cow when the opportunity arises. We by far take more cows than bulls each year but I can tell you that our hunters would not have booked with us if they knew that there was no possibility of taking a bull elk.

Here are some suggestions:

As an outfitter, we have tried, unsuccessfully, on several occasions to get the National Forest in this area to allow us to obtain Field Use Days so that we can take our hunters into the NF to harvest elk. If the current population of elk is over objective, you would think that allowing us to bring additional elk hunters into the area would be encouraged not discouraged. Many of our hunters would never go on a DIY hunt and rely on booking with an outfitter for their hunting experiences. It seems apparent that MT outfitters in general are being treated as a problem rather than a solution to game management issues. I can tell you without hesitation that a guided hunter's chance of success is much greater than that of an unguided hunter, as it is our job to become efficient at what we do. So how about allowing more outfitters such as J&J Guide Service the opportunity to bring our clients onto public NF lands to harvest additional elk. It seems unfair that local cattle ranchers continue to be able to conduct business on NF lands yet outfitters are being weeded out one by one. Elk herds are drawn to the properties that we lease because of the agriculture that exists on them yet when the herd jumps the fence onto NF land, we are unable to pursue them which greatly limits our clients success rate.

Also:

From my personal observations and from observations of the guides that we employ, I can tell you that this area of MT has a very big problem with

hazing of elk herds in an attempt to keep the herds on private property by not allowing them to leave it, when their natural tendency is to move from one area to another in search of food and water. We have been extremely frustrated to watch this happen year after year with nothing being done about it. The problem isn't with all MT Outfitters or landowners, the problem is that certain outfitters and landowners think that laws don't apply to them and they do whatever they can to try to keep an elk herd on their lease or property. I have personally talked to a Game Warden about this problem and he told me that it is very hard to prosecute in situations like this. However, with today's technology, I find that very hard to believe. If the herds are allowed to move about freely, there will be more elk harvested.

Another idea would be to allow for a second "antlerless" elk tag at a greatly reduced cost. You might also try working with outfitters on incentives for them to allow the harvest of second "antlerless" elk for little or no additional cost to their already expensive hunt.

Lastly, please be careful in your attempt to reduce the number of elk in this area, because as I have witnessed in WI, ID and MT, when a game animals numbers drop too low, nobody is happy and it can take years and years to build the population back to desirable numbers.

Thank you and best regards,
Eric Wilund

17. Robb Branson robbranson@gmail.com
Hi-

I would like to be included into the comment process for the 2019 Shoulder Season in Montana.

I have lived in Montana for most of my life and really enjoy hunting as part of my lifestyle. It is a huge part of my families fall activities! We are a family of Elkaholics! Never hoping to recover but always seeking that next Montana elk fix. The general season, block management and permit system is great Thank you MT FWP!

The shoulder season now that is a different story! Not easy & promotes a "who you know process!" Or as my family calls it, "A good old boy system!" If the current process is to remain then the first request I have is to change the name of the season. It needs to be changed to: LANDOWNERS: FRIENDS AND FAMILY HUNT ONLY. The word Season in the current name is misleading.

My second request is to have ACCESS! I am proud of Montana's current Block Management program! It was and may still be a leading program in the nation for access. The current Shoulder season is not even on the same planet!!! It's as if the landowners are running this program for the Montana FWP??? Are they? Why? The concept of the Shoulder Season is good but the process and access are HORRIBLE! Go back to the drawing board and think more along the lines of who, what, where, how and why like you did when the Block Management program took shape!

FWP- You have an access problem which leads to an elk problem!!

Thank you for the opportunity to state my thoughts.

Robb Branson

"Think about what you think about."

Anonymous

18. Larry Cragwick ldcrag@yahoo.com

I am a guide and hunter in sw MT of 22 years.

My observation being in the field all fall September through November.

In the Boulder MT area there is way too much pressure on cow elk from August through February. This year I saw only 20% as many elk as previous 3 seasons. Most hunters I talked to in SW MT reported the same. Where bid our elk go. Please stop all shoulder seasons and B tags for a second elk and manage for quality hunting. It seems all you care about is selling more tags and taking care of private ranchers.

19. Kraig Saltness spurcreek@yahoo.com

Hello

I am a true believer in the cow elk hunts. I have killed cow elk for the last 7-8 years. Mainly because a young elk eats better than the bulls.

We have had 2 large particles of our hunt areas bought up by the rich and now they have just become reserves for large herds of elk.

It is obvious that all the cow hunts possible will never accomplish results needed for the desired results wanted until the Fish and Game come up with a solution to private ranches hoarding the large herds.

These elk "belong to the public and not the privatized rich ranches".

Most of these ranches are encouraged by outfitters to lock everyone out.

Some say the outfitters are catered to more than the general public?

Even though a lot of the legislators are controlled by the wealthy we need to find a way threw legislation to release our public property from these privatized ranches. Thank you. Kraig Saltness, Three Forks, Mt

20. John P. Simmons jmsimmons@nemont.net

We should not be killing cow elk in August, the calves need their mothers milk and care at this time.

I believe we should also shut down the late hunt season at least by January 15.

If you want to harass the elk early we should be able to kill a bull only. If a land owner wont let someone hunt bulls for 2 weeks early close the season for cow hunts on their land that run after the general season closes. it should be a crime to hunt elk for six months out of each year.

John Simmons

Absarokee, Mt. 59001

21. **From:** msimmons@nemont.net [<mailto:msimmons@nemont.net>]

Sent: Monday, January 21, 2019 10:17 PM

To: FWP General <fwpgen@mt.gov>

Subject: Hunting accesses

I sent this to the Fish & Game Committee

Fish and Game Committee 2019

It seems that the norm of the last few years is when a large ranch or farm is sold to some nonresident Billionaire, many access roads and trails to nearby public lands are soon gated shut. Some of these lands are set up as a private zoo hording 100, s of public owned elk, deer, antelope and other game. There no one may hunt

or if so, just special friends or paying hunters. How does anyone expect the FWP to control the population numbers thus overgrazing or diseases?

Many ranch lands old or new may include deeded land plus public leased land that the owners may not allow access to the general public. I know of more than 15 of these type land holdings within 25 miles of my home. It's common to see 100 to 250 and even 750 elk on these "private holdings" being hoarded; many times, they are easy to see, just inside the fence lines where the hired hands cruise in vehicles or an airplane or a helicopter. If my memory is correct, Montana has a law that there are to be NO NEW game farms?

Many of these land owners sell our public elk for up to \$10,000. They install gates across public roads that take up to 15 years to legally be removed. This is happening on your watch! You legislators need to come up with some laws that confirm that no one can block a road without first showing a legal document that they own the road. Also, a law that states if some land owner creates a situation that adversely effects the wellbeing of our wildlife that land owner will be responsible to correct the wrong. I know an over populated species can easily become a hot bed for disease. All I have heard is that the CWD started in Colorado on game farms. Several years ago, tuberculosis showed up here from Canada game farms. America's livestock owners imported Brucellosis from Europe. As soon as these current overcrowded land holdings develop one of these major health problems the public will no doubt be held answerable so we will be erroneously asked to pay with general fund money.

I question the need for weeks of shoulder seasons to allow our local hunters a chance to help cull the over populated antlerless elk that are bothering these modern-day Game Ranchers. Especially we shouldn't be hunting our brood elk in August.

Montana needs laws that provide access for all back-country visitors to the public land that is surrounded or blocked by private land. I have read that the US Forest Service extends public land grazing contracts every 10 years. I have been told the State land leases and the BLM also work this way. Why can't these government agencies write in these contracts that if a person or corporation owns deeded land that is blocking access to public land nearby that if they want to lease our public land, they must allow some public access to that public land or other nearby public land they may have blocked. This access could be designed such as our Block management systems. It could be to allow in just a few folks daily. Access could be on an existing two track road or on foot or horseback. It could be just to follow a fence line and folks could be required to stay a few feet from the fence.

John Simmons Absarokee, Mt. 59001

22. From: Robert Delmas <robedelmas@icloud.com>
Sent: Sunday, January 13, 2019 10:46 PM
To: FWP General <fwpgen@mt.gov>
Subject: Shoulder seasons in Region 5

I do not agree with the shoulder hunts. Too long of hunting season and too much pressure on the animals. If you have an abundance of numbers it is time to relocate some of the animals to other regions where the numbers are declining and not recovering due to predators. (Region 1, Region 2). Other states relocate for balance. It is time Montana start looking to their neighbors for ideas to keep the big game for all of our hunting traditions.

Shawn Ray
406-293-6922

23. Name: Ed Heim
Phone Number: 4065632681
Email: kheim959@bresnan.net

Best thing you all could do is shut down shoulder season. killing pragnet elk cows is not good. you are killing two elk. were I hunt the wolves are taking a toll out side anaconda. I have talk to a lot of hunters they say the same thing shut the shoulder season down.

24. **From:** janeanc <janeanc@charter.net>
Sent: Sunday, January 20, 2019 3:59 PM
To: FWP General <fwpgen@mt.gov>
Subject: Public land

Hey just some suggestions. Change unit 380 into a bow and rifle draw for elk. 150 tags each and no spike hunting. Limit the 410 archery bull tags to 800. Make a trophy elk unit in beaverhead county. No shoulder seasons. Make private landowners block management. A true block management. Make all mule deer limited entry. People would still have to buy the tag and apply. So u don't lose money. Please manage for the public land hunter. Thanks for your time

25. **From:** Brian Ohs <brian@mtbeef.org>
Sent: Friday, January 18, 2019 10:08 AM
To: Kujala, Quentin <qkujala@mt.gov>
Cc: rstucker@ttc-cmc.net
Subject: Shoulder Season comments from MSGA

Hello Quentin,

The Montana Stockgrowers Association (MSGA) has supported and continues to support hunting goals that reduce elk populations in certain districts that have been substantially over their objective numbers. Therefore, MSGA recommends that the Montana Department of Fish, Wildlife and Parks (FWP) and the commission continue to develop and implement hunting seasons and harvest strategies, including shoulder seasons, liberalized cow tags, disbursement hunts and party hunting that will result in targeted levels of elk harvest and elk numbers in each district. As you well know, MSGA members are concerned with increased numbers of elk and potential increase in objective levels.

Thank you for considering our comments,

Brian Ohs | Director of Natural Resources
Montana Stockgrowers Association | Montana Association
of State Grazing Districts | Montana Public Lands Council
406.442.3420 | brian@mtbeef.org

26. **From:** matthew klumpp <walkeroutfitting@gmail.com>
Sent: Friday, December 7, 2018 11:19 AM
To: FWP General <fwpgen@mt.gov>
Subject: Proposed performance-based elk shoulder seasons for 2019.

I have read through the proposal and the supplemental supporting and opposing comments for the 5 points outlined in the proposal. The one issue that occurs to me that would effect everything else is the Elk Objective numbers themselves in these 5 districts. Are these really the numbers in these particular districts that we should be trying to manage to? I understand that they were established quite some time ago and a lot can change on a landscape especially in a particular area over time in Montana. In my opinion the first action that should be taken is determining if these Elk objectives are correct for these 5 districts. Then the rest should fall into place as far as management is concerned. I appreciate the opportunity to make a comment. Thank you.....Matthew Klumpp

From: [Kujala, Quentin](#)
To: [Speeg, Karen](#)
Subject: shoulder season comment
Date: Wednesday, January 23, 2019 6:52:00 PM
Attachments: [image001.png](#)

Karen--

I received a call to my voice mail from a Mr. Jeff Beck. He expressed concern that shoulder seasons in the Brown's Gulch area near Deer Lodge were targeting the wrong elk.

Please include this email in the public comments we've received on shoulder seasons for the Feb commission meeting.

Regards and thanks,

Quentin Kujala

Bureau Coordinator

Wildlife Division

Montana Fish, Wildlife & Parks

P.O. Box 200701

Helena, MT 59620-0701

O: (406) 444-5672 | C: (406) 461-9380

fwp.mt.gov





Protecting Montana's wildlife,
land, waters and hunting & fishing
heritage for future generations.

Jan. 17, 2018

Dan Vermillion, Chairman
Montana Fish and Wildlife Commission
1420 E. Sixth Ave.
Helena, MT 59624

RE: Elk Shoulder Seasons

Dear Chairman Vermillion and fellow commissioners,

The Montana Wildlife Federation (MWF) is our state's oldest and largest wildlife conservation organization. We have an 83 year record of working with landowners to resolve the many difficult issues of managing our public trust wildlife resources, including the issue of elk management. In fact, MWF was formed when landowners joined hunters to restore depleted wildlife, including elk. They remain one of our most valued wildlife species, not just for hunters, but also for wildlife watchers and landowners.

CONCERN: When MWF supported the establishment of elk shoulder seasons we did so based on the premise they would be a temporary action to reduce elk numbers to proposed objectives and to improve distribution of elk on the landscape. We also agreed that we would evaluate the season's effectiveness at the end of three years based on specific performance based criteria. Montana Fish, Wildlife and Parks (FWP) has proposed a new harvest strategy on five hunting districts that have clearly not met the harvest objectives. While we support this new harvest strategy as a potential means of meeting harvest criteria we believe we have a commitment to the sportsmen and landowners to evaluate success or failure of the shoulder seasons against the established performance criteria.

RECOMMENDATION: MWF strongly recommends that all the elk shoulder seasons from this year's hunting regulations be removed and an addendum process be used to make necessary changes to regulations once the review is completed. That will allow FWP to gather the harvest data from the 2018-2019 hunting season and assess whether districts are meeting the criteria laid out in the original shoulder season proposal. Those criteria are essential to creating a well distributed harvest across the landscape that meets our established harvest unit objectives. There is no reason to believe that shoulder seasons that failed to meet the criteria after three seasons will achieve different results in a fourth season. Nor should we continue shoulder seasons where distribution and population objectives have been achieved.

RATIONALE: We are concerned that moving forward with another hunting season will further expectations that shoulder seasons are the norm for some hunting districts rather than a temporary harvest strategy. We already see this with additional shoulder seasons being discussed, public land being suggested for inclusion and cow elk hunts being marketed during existing shoulder seasons.

We know from past experience with numerous late seasons there are three significant principles of elk management: 1) We can't kill a season's worth of elk in one week. 2) We can't kill a hunting district's worth of elk on one ranch. 3) Elk beget elk, meaning once they find a refuge or place with very limited hunting pressure, other elk show up. Put another way, if we start to tailor seasons around properties that are only killing bulls during the general season, with no or very limited cow elk harvest, we will never reach the population and distribution objectives. Crafting such seasons would represent a significant change in elk management in Montana.

In the mid 2000's, FWP developed Administrative Rules giving ample tools to the agency to address landowner concerns. They ensured we would have adequate management and game damage hunts to address landowner issues, while ensuring that we have adequate public access during the general and archery seasons to properly manage both elk population numbers and their distribution.

While some have stated that FWP is trying to force public hunting access onto private lands, MWF sees it another way; FWP and the sportsmen of Montana are trying to implement effective management of our public elk and that requires a partnership with landowners. We believe that landowners can benefit from both an outfitting operation as well as allowing public hunting of cow elk to improve distribution needs. It happens on many ranches throughout Montana and we need such partnerships to continue. We could run shoulder seasons for years and never reach the harvest needed if we push elk from places where there is adequate hunting pressure to properly manage the herds, to places where there isn't. However, we must always be vigilant that elk are a public and not a private resource and must be managed accordingly. Montana is at a crossroads in the management of our public trust wildlife.

We also need to consider how these shoulder seasons are portrayed to members of the non-hunting public. The late shoulder seasons requires hunters to hunt elk in the heart of winter, when they're stressed, dealing with cold temperatures and deep snows. Late season hunting can also create negative situations where elk and hunters are concentrated, often leading to lapses in ethical behavior that are quickly circulated on social media and news outlets. Fair chase is paramount in regards to continued public support for hunting.

Some individuals are proposing that late shoulder seasons be expanded to include public lands. Montana's hunters will not accept large scale hunting on public land at that time of year. There is not an overabundance of elk on public land in most places during the general season. Applying more hunting pressure to the elk on our public land (which are often at higher elevations and have deeper snows) does not address the larger issue of unacceptable elk distribution on the overall landscape during the general season.

PROPOSED FUTURE DIRECTION: MWF understands that crafting an addendum to the hunting regulations that reinstates a shoulder season in August demands a lot of work from FWP staff. However, with an issue this important, it is in the best interest of our elk herds, hunters, wildlife enthusiasts and landowners to do so.

The larger question is what to do next as elk populations continue to grow and distribution is unacceptable to both landowners and sportsman. To date our focus has been on sportsmen harvest strategies which have delivered mixed results. MWF believes it is time for the agency and stakeholders to proceed with a collaborative decision making process that focuses on clearly defining current elk management issues and developing additional sportsmen/landowner actions to deal with those issues. Those actions should not be limited to harvest strategies alone. For example, should we consider modifying the population objectives that were established 15 years ago when elk distribution was much different than today? Besides hunting, what other ways of affecting distribution of elk on the landscape are available? Such questions could be addressed if the state's elk management plan was revised, an action MWF would support.

Thank you for the opportunity to comment on this important issue for Montanans. MWF appreciates the hard work that FWP staff does every day to ensure we maintain abundant wildlife and the best hunting opportunities in the West. We hope we can continue our strong partnership and address the very real challenges around elk management in our state.

Sincerely,

A handwritten signature in black ink, appearing to read "William Geer". The signature is fluid and cursive, with the first name "William" being more legible than the last name "Geer".

Bill Geer
President

Montana FWP Commission:

What does it take to keep ordinary Montanans in the framework of the public trust responsibilities while conserving wildlife? Ensuring there is an applicable public process that truly yields a product that is meaningful, yet equitable while maintaining public trust ownership. That product, has to include landowners that allow a public access element during the archery & general seasons, so they get a fair shake. What is not allowable; attempts to overtake the public trust system and game it for personal gain (profit).

Laurel Rod & Gun Club, one Montana's oldest rod & gun clubs, with underpinnings going back as far as the 1920s. LRGC's 400 family members appreciated the ability to comment on these values and have always been involved in the decision making processes.

LRGC's 400 family members strongly request elimination of all the elk shoulder seasons from the next year's printed hunting regulations.

The agency needs to gather the final harvest data from the 2018-2019 hunting season to assess whether districts are meeting the criteria laid out in the original shoulder season proposal. These criteria are essential to have effective elk management, Broad harvest is necessary across the landscape to fully reach objectives in districts that are over the objective.

Montana is at a crossroads in the management of our public wildlife. For years, hunters and landowners have been partners in working to conserve and manage our wildlife.⁶ We could run shoulder seasons for years and never reach the harvest needed if we push elk from places where there is adequate hunting pressure to properly manage the herds, to places where there isn't.

Members of the non-hunting public and many hunters as well take issue with pursuing elk, in some shoulder season instances; six months a year to be just plain wrong-the critters need a respite and we owe that to them. We have game damage hunts, which are specific-not general across hunt districts and we have other tools in the elk management tool box that have never seen the light of day, how come-politics?

In closing, LRGC understands an addendum to the hunting regulations that reinstates the shoulder seasons in August, once we have the data from the third season, demands a lot of work. However, it is in the best interest of our elk herds, hunters, wildlife enthusiasts and landowners to do so. There is no reason to believe that seasons that have failed to meet the criteria after three seasons will achieve different results in a fourth season.

LRGC family members appreciate the opportunity to comment on important issues. Thanks a bunch.

Respectfully submitted,

LRGC Conservation Committee



P.O. Box 793, Helena, MT 59624, ph: 406.431.4326

January 17, 2019

Montana Fish, Wildlife and Parks
Attn: Wildlife Division
PO Box 200701
Helena, Montana 59620-0701
Re: Proposed 2019-2020 Elk Shoulder Seasons

Orion is committed to responsible hunting, fair chase ethics, keeping hunters on the forefront of the nation's conservation ethic and improving the image of hunting. Orion--The Hunter's Institute is writing to offer the following comments about the proposed 2019-20 elk shoulder seasons (ESS).

In the interest of cooperation, Orion is willing to support another *experimental* shoulder season in license year 2019. However, our support is dependent upon FWP committing to conduct a comprehensive review of all shoulder seasons before requesting authority to conduct any additional ESS post 2019. It is imperative that the review be comprehensive and not simply consider "elk numbers" and whether the ESS were effective in achieving population objectives. The review must also consider the impacts of ESS including but not limited to: hunter experience; public perception of ESS; ESS' effectiveness in redistributing elk to public land; public access to elk; landowner relationships; standards of *Fair Chase* and an acceptable hunter's ethic. Orion also believes that because the elk management plan is central to the goals of the ESS, the plan must be updated as soon as possible.

Orion is concerned with some aspects of ESS dates and how they could produce situations that would be negatively perceived by the public. Orion recommends that the 2019 ESS start no sooner than September 1st to give calves extra time to wean. Inflicting deaths on still nursing calves as an unintended consequence is cruel and devastating to the image of hunters and hunting. Moreover, we recommend that the season end December 31st so that elk are not hunted in winter conditions when they are most vulnerable. The ethic of fair chase is critical to the acceptance of hunting by the general public. Additionally, we are concerned that with today's social media and "viral" atmosphere, the likelihood of photos of unborn elk, present at that point in the year, going public is high. Such photos are known to exist to members of the Orion board of directors, and would be devastating to the image of hunters, hunting, and FWP.

In closing, we will support and assist FWP and the FWP Commission as they devise a way to manage Montana's world class elk herds. We simply must do better for hunting, hunters, and elk than our present system. Without data to evaluate the efficacy of ESS the system could be fairly described as "shoot first and ask questions later."

Thank you for your time, efforts and consideration of our comments,

Respectfully,

Thomas Baumeister, President and Corey Ellis, Director

Dec. 10th - 2018

DEER FISH & GAME COMMISSION.

I AM ANGRY BEYOND WORDS WITH THE PROPOSALS TO MAKE MAJOR CHANGES IN HUNTING DISTRICTS 411-511-530.

AT 75 I AM A LIFETIME MONTANA HUNTER AND HAVE THE ADVANTAGE OF JUDGING MANAGEMENT PRACTICES OVER TIME. THAT TIME INCLUDES A MONTANA THAT ISSUED FEWER THAN 250 ARCHERY LICENSES ALL TO TRADITIONAL LONG BOW HUNTERS.

I HAVE HUNTED ONE RANCH ON THE SOUTH SIDE OF THE SNOWIES FOR THE PAST 16 CONSECUTIVE SEASONS. IN THAT TIME I HAVE DRAW SEVERAL EITHER SEX TAGS. ALSO OF GREATER SIGNIFICANCE IS THIS FACT - I HAVE ONLY SEEN ONE ELK THAT WAS NOT A BULL AND THAT WAS A CALF IN 2017. THE OPPORTUNITY TO HARVEST A COW APPEARED ONLY ON RANCHES THAT WERE LEASED AND ~~THAT~~ THE LAND OWNER WANTED \$900 PER COW.

NOW YOU ARE PROPOSING THAT THE BONUS POINTS I HAVE ACCUMULATED CAN ONLY BE APPLIED TO A DRAWING THAT LIMITS ME TO THE BEST TWO WEEKS OF THE SEASON? - WHILE ALLOWING BOW HUNTERS TO FACE NO CHANGES?

How dumb ARE YOU TO NOT UNDERSTAND THAT THE BULL OPPORTUNITY IS BEST

AT THE END OF THE SEASON - NOT
THE BEGINNING.

ACCESS IS. The Snowies is limited.
ONE REASON IT IS LIMITED ^{BECAUSE} MECHANIZED
OUTFITTERS HAVE LEASED HUNTING RIGHTS
ON MANY RANCHES --- SO THEY CAN
OUTFIT PRIMARILY BOWHUNTING'S 3700
THOUSAND PERMIT HOLDERS.

LAST SPRING WHEN VISITING THE
DOCTOR I ASKED HIM HOW HE WAS
DOING. HE REPLIED "NOT SO GOOD I
DIDN'T GET AN ARCHERY PERMIT FOR THE
FIRST TIME IN 21 YRS." I REPLIED -
"HUNT A BOW." HE THEN SAID HE
ONLY WANTED A BULL. FACT - ARCHERY
HUNTERS MAKE ALMOST ZERO CONTRIBUTION
TO ELK MANAGEMENT --- AND THE
FISH & GAME DEPT. WILL NOT REQUIRE
THEM TO.

IN CONCLUSION, AS A RIFLE HUNTER
I AM BEING RELEGATED TO BOW HUNTING.
MY 8-9 BONUS POINTS - REPRESENT 8-9
YEARS OF WAITING FOR AN EITHER SEX
TAG - HAVE NOW BEEN CONSTRICTED TO
THE 1ST TWO WKS. OF THE SEASON. AND
FINALLY MY THANKSGIVING TRIP TO THE
SNOWIES IS HISTORY - NO LATE SEASON HOPE.

A Very-Very Angry 75 yr. old,

Don K. K.

DAVID
HAUFFMAD
Box 486
RONAN MT.
59864

December 19, 2018

RECEIVED

DEC 21 2018

FISH, WILDLIFE PARKS
DIRECTOR'S OFFICE

Montana Fish Wildlife and Parks Commission
1420 East 6th Avenue
Helena, Montana 59620

Subject Matter: 3rd Montana FWP Shoulder Season

Land Involved: Sections 34 and 35, Township 11 North, Range 14 West – 1120 deeded acres

Land Owner: William L. and Phyllis L. Bouchee
1075 Anglers Bend Way
Missoula, Montana 59802

Land Purpose: Elk hunting and secondary cattle grazing to McGowan, Radke and Conn since 2015

Dear Commissioners:

I am writing in response to the recent December 10 meeting and discussion on prior and future shoulder seasons. Another meeting is scheduled for February 2019. Make it known that I am not opposed to the shoulder seasons, but believe there needs to be some radical changes. I must confess that I am not personally aware of elk numbers that you state are in this region. You come with field and scientific conclusions that support the number data. Elk appear to be a menace to some ranchers. It would also be a shame to lose this wildlife treasure with disease, starvation and maybe wasting without the best possible game management.

So here we go and I will list my thoughts by number and not necessarily in any order:

1. Discontinue the shoulder season opening of August 15. Open bow season after September 1 and the regular hunting season on or about October 25 just as in the past.

Reasons: (a) It is far too hot August 15 to be harvesting elk that could spoil very easily. (b) It has to be very disruptive to the breeding season for both sexes. (c) We think, my young son and I, that the shoulder season has eliminated the bow season for us, at any rate on our land the past 2 years – no bulls and few cows. (d) This shoulder season, 6 months long, defies the rational of “fair chase”. It seems insane to chase these majestic animals 6 months a year. (e) The shoulder season should be set for October 25 (on a Saturday as usual), same as rifle season and closed February 25, open 4 months and closed earlier or extended longer at the option of FWP.

2. Sale of shoulder season tags: (a) Sell on or before October 1 of each year if rifle season opens on the traditional October 25 or so date. You can buy "unlimited" tags per person in the specified regions by FWP. (b) At this point, I think you should involve public lands, Federal and State in the designated hunting zones. The elk easily find their way into public lands when they are pushed knowing they are safe. If private resource lands are in the zone, it would be up to them to determine what type of access they would give, if any.
3. As I write this letter you should know that the abundance of elk, over population in the area, are not a problem on my land. (a) We would welcome more elk and advocate season changes that we think are positive. Hunting for us has been the worst the past two years. Grazing is limited to try to leave some grass for the benefit of wild animals. (b) I'm not aware of your contact and cooperation you have given local ranchers bombarded with the elk problem. I advocate that you put control of hunting in their hands to solve the individual ranch problem: i.e., multiple tags, hunting rules on their land, parking, retrieval, invitees, times, dates and others with FWP approval. (c) If I had the elk numbers, I could easily invite, take to my property alone and shoot 25 head. The hunters would be my family and friends. I'm personally not interested in any type of opening to the general public; I think, a common opinion. Besides, I have two (2) private easements to go through to my land with locked gates. And you would have to leave the hunting rules in my control. We are law-abiding and respectful of this wildlife treasure. I love to see the animals as well as shoot one occasionally for the meat.
4. Finally, I would support a deprivation hunt in the late winter organized and supported by the FWP. This hunt(s) would be coordinated with the local ranchers that feel the need. Any tag holder could participate, hunt or just tag one after a kill and take the meat home for processing. Perhaps meat could go to charity. Those organizations would have to provide collection and processing of the meat.
5. I fully understand this complex wildlife problem. There are no easy solutions. It would be a shame and national disgrace to see these majestic animals, I say again, to be decimated by starvation, disease or other because of over-population. I don't know what to do besides trying to reduce the population by hunting. I'm open to solutions on my dirt and thank you for what you are doing and keep up the good work. This epistle comes from a hunter of 65 years starting in Livingston, Montana.

Happy Holidays and successful hunting solutions to all of you.

Bud Bourke



P.O. BOX 7792 MISSOULA, MT 59807 (406) 241-3121
www.hellgatehuntersandanglers.org

FWP Wildlife Division
PO Box 200701
Helena, MT 59620-0701

RE: Proposed Elk Shoulder Seasons for 2019

Dear Montana Fish Wildlife and Parks,

Thank you for the opportunity to comment on the elk shoulder seasons for 2019. Hellgate Hunters and Anglers (HHA) is an all-volunteer, local hunting and angling organization representing over 400 hunters and anglers in the Missoula area. HHA has been keenly interested in the efficacy of shoulder seasons since they were proposed three years ago.

While HHA does support FWP's goal to bring elk populations to objective, we do have concern with the lack of data that is present to continue to justify such high levels of harvest. For example, Region 2 had the highest success rates of "realized harvest" of adult cows for the shoulder and general seasons in the state, with HD215 at the highest rate of 178% (927 realized / 520 needed) of the "harvest objective realized." If that trend continues, which we would expect with the OTC R2 antlerless B-license, it is possible that FWP could reach population objective in that district and others after the completion of the 2018-19 general and shoulder seasons. Poor aerial survey conditions in much of western MT in 2018 with few solid elk counts makes it challenging to determine the on-the-ground effectiveness of the shoulder season.

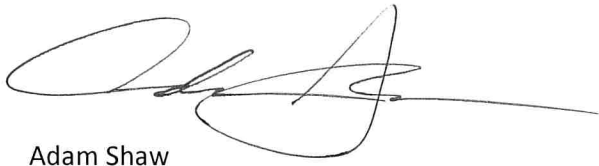
The 2019 data will likely be very informative. Unfortunately this data will be collected after the 2019 Regs are proposed and accepted. Therefore HHA recommends that FWP R2 re-evaluate the 2019 shoulder season once the biologists have completed their winter/ spring surveys. Additionally, HHA recommends that FWP issue corrections or amendments to the regulations in the event the 2019 surveys show that the elk populations in the shoulder season regions are at or near objective due to liberal harvests. While HHA does not oppose the current proposed shoulder seasons, we urge the Department use the best available data to inform elk management decisions in R2 and that rushing the process reduces the opportunity for FWP wildlife managers to make informed decisions.

In some districts, we're easily meeting the performance criteria. In those cases, elk harvest is strong in the general season, and the shoulder season is working to redistribute elk as well as help get the total harvest we need. In some cases, hunting access to private lands has increased, and it's showing in the results.

In other districts, we are not meeting the criteria, and it's time to try something else. Shoulder seasons were sold as yet another tool to help manage elk. We should not keep doing something that is not working after three seasons and hope that it will work. Moving to two weeks of bull and cow elk hunting and three weeks of cow-only hunting could help focus our harvest for three weeks of the general season on cows. That will allow the meat hunters to go to these districts and hopefully bring elk numbers down dramatically by focusing the harvest on cow elk.

Thank you for the opportunity to comment on shoulder seasons and HHA welcomes further opportunities to weigh in and provide feedback.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Shaw', with a long horizontal flourish extending to the right.

Adam Shaw

President
Hellgate Hunters and Anglers



219 Vawter Street
Helena, MT 59601
(406) 449-2795

January 18, 2019

Montana Fish, Wildlife and Parks
Attn: Wildlife Division
PO Box 200701
Helena, Montana 59620-0701
Re: Proposed 2019-2020 Elk Shoulder Seasons

Helena Hunters and Anglers Association (HHAA) is committed to promoting the highest standards of sportsmanship as hunters and anglers; and to strengthen private landowner—sportsman relations. HHAA is writing to offer comments about the proposed 2019-20 elk shoulder seasons (ESS). Overall, we are concerned that ESS have led us down this path of *killing elk* instead of *hunting elk*. We feel it is time to reverse this trend.

HHAA offers *conditional support* for another ESS in 2019. We encourage the FWP Commission to:

- (1) implement a moratorium on all ESS post the 2019 season until FWP:
 - (a) performs a comprehensive analysis of the effectiveness of ESS, and
 - (b) prepares a revision of the 2004 elk management plan
- (2) shorten the 2019 season to September 1 - December 31.

With regard to # 1a. we are concerned that FWP will perform what is expedient in evaluating the performance of ESS by merely considering “number of elk harvested” and whether the ESS were effective in achieving management objectives. We feel the review must also consider the impacts of ESS on the *measures of the hunt* such as hunter experience, public perception, elk distribution on public land, public access to elk, landowner relations, and *fair chase* hunting.

With regard to # 1b. we see before us an outdated elk management plan which is the crux of the management/social/ethical problems we are now experiencing. Much has changed over the 15 years since the plan was last revised, and just like FWP must update its organizational *Vision & Guide* from time to time, so must it also follow suit with regard to its obligations to the people and their relations with elk.

With regard to # 2. we are concerned that the proposed season dates will negatively impact the welfare of elk and the image of hunting. HHAA recommends that the 2019 ESS start no sooner than September

1st to give calves extra time to wean. Inflicting deaths on nursing calves is cruel and reflects poorly on hunters. Moreover, we recommend that the season end December 31st to avoid hunting elk in winter conditions when stress levels are high. *Fair chase* is critical to the acceptance of hunting by the general public, and we feel ESS are problematic from the standpoint of both animal welfare and hunting ethics.

We trust in the ability of the FWP Commission to make the right decision. Thank you for your consideration of our comments.

Sincerely,

Stan Frasier, President

Thomas Baumeister, Director